

POOR QUALITY ORIGINAL

Rec. No. 40263

MIED ProSe 1 (Rev 5/16) Complaint for a Civil Case

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

**Sybrena Evans
Sybrena Kenan and Associates, Inc.,
dba/UNWINEWITHTEDDY**

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

v.

Defendants:

1. Jane Doe, also known as:

**Danielle Robertson
Dani Robertson
Dani Montana
Turth Teller Dani
Lori Davis
Danielle Robertson, LLC.**

2. Jane Does 1-10

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case: 5:24-cv-13435
Assigned To : Levy, Judith E.
Referral Judge: Stafford, Elizabeth A.
Assign. Date : 12/23/2024
Description: CMP Sybrena Evans v.
Danielle Robertson, et al. (JH)

Jury Trial: ☐ Yes ☒ No
(check one)

Complaint for a Civil Case

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I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Sybrena Evans</u>
Street Address	<u>17710 Lakeview Cr.</u>
City and County	<u>Northville Wayne County</u>
State and Zip Code	<u>Michigan, 48168</u>
Telephone Number	<u>(248) 362-1300</u>
E-mail Address	<u>unwinewithteddy@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Danielle Robertson</u>
Job or Title (if known)	<u>YouTube Content Creator</u>
Street Address	<u>8 The Green STE A</u>
City and County	<u>Dover, Kent County</u>
State and Zip Code	<u>Delaware, 19901</u>
Telephone Number	<u>(860) 864-0028</u>
E-mail Address (if known)	<u>danimontana2022@gmail.com</u>

Defendant No. 2

Name	<u>See "Additional Parties to The Complaint" page</u>
Job or Title (if known)	<u></u>
Street Address	<u></u>
City and County	<u></u>
State and Zip Code	<u></u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

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Defendant No. 3

Name _____
 Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known) _____

Defendant No. 4

Name _____
 Job or Title _____
 (if known) _____
 Street Address _____
 City and County _____
 State and Zip Code _____
 Telephone Number _____
 E-mail Address _____
 (if known) _____

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

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Additional Information:

Additional Parties to The Complaint:

Defendants:

1. Jane Doe, also known as:
Danielle Robertson
Dani Robertson
Dani Montana
Turth Teller Dani
Lori Davis
Danielle Robertson, LLC.
2. Jane Does 1-10

Defendants Address:

8 The Green STE A
Dover, Kent County
Delaware, 19901
(860) 864-0028
danimontana2022@gmail

Danielle Robertson Social Media Accounts:

YouTube:

DaniRobertson
Truth Teller Dani
Dani Montana
Unhinged With Bundy
WhewChile The Ghetto
Dani Monroe

Other Social Media :

X formerly known as Twitter
Facebook
Instagram
Twitch
Stationhead

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A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Sybrena Evans
is a citizen of the State of (name) Michigan.

b. If the plaintiff is a corporation

The plaintiff, (name) Sybrena Kenan and Associates, Inc.
is incorporated under the laws of the State of (name)
Michigan, and has its principal place of business in the
State of (name) Michigan.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) Danielle Robertson, is a citizen of the
State of (name) Delaware. Or is a citizen of (foreign
nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated
under the laws of the State of (name) _____, and
has its principal place of business in the State of (name)
_____. Or is incorporated under the laws of
(foreign nation) _____, and has its principal place
of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
See Attachment "Relief"

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Nature of the Case

This federal lawsuit arises from a sustained campaign by the Defendant Danielle Robertson to harm the Plaintiff, Sybrena Evans, through copyright infringement, defamation, harassment, privacy violations, and cyberbullying. Since 2022, the defendant has repeatedly violated the plaintiff's rights by unlawfully using copyrighted materials and filing fraudulent copyright claims—primarily through impersonation—to commit fraud and damage the plaintiff's YouTube channels, UNWINEWITHTEDDY and RunTellThatToo. These actions have caused significant harm to the plaintiff's reputation, emotional well-being, and professional career.

Plaintiffs, Sybrena Evans and Sybrena Kenan and Associates, Inc., dba UNWINEWITHTEDDY, bring this action against Jane Doe, also known as Danielle Robertson, Dani Robertson, Dani Montana, Truth Teller Dani, Lori Davis, and Danielle Robertson, LLC. The complaint reserves the right to amend to include additional defendants identified as "Jane Does 1-10." These placeholders represent individuals or entities whose identities and roles are currently unknown but believed to be involved in the alleged actions.

This lawsuit seeks to hold Danielle Robertson accountable, secure compensation for damages, and obtain injunctive relief to prevent further harm.

Count 1: Copyright Infringement

Count 2: Defamation and Privacy Violations

Count 3: False Reports and Fraudulent Claims

Count 4: Cyberbullying and Harassment

Count 5: Impersonation of Others to Commit Fraud

Count 6: Conspiracy to Commit Fraud and Cause Emotional Distress

Additional Information:

Count 1: Copyright Infringement

On or around April 11, 2024, Defendant Danielle Robertson unlawfully obtained and used copyrighted images and video testimony of the Plaintiff, Sybrena Evans. These materials, created on April 9, 2024, during a closed Hearing on Petition for Personal Protection Order (PPO) in Wayne County's 3rd Judicial Circuit, are protected under the Copyright Act of 1976.

Facts Supporting the Claim

Ownership:

The plaintiff owns the copyright to her personal image, likeness, and video testimony as depicted during the hearing. These materials were fixed in a tangible medium during the proceedings, and copyright protection was automatically conferred upon creation under 17 U.S.C. § 102(a). The plaintiff retains exclusive rights to these works, including reproduction, distribution, and public display (Exhibit A).

Unlawful Acquisition:

The defendant conspired with the "PPO Petitioner" to unlawfully record or access the private court hearing. The PPO Petitioner either directly provided the unlawfully recorded content to the defendant or facilitated real-time access via phone. (Exhibit B).

Unauthorized Use and Distribution:

On April 11, 2024, the defendant publicly disseminated portions of the recorded content during multiple live broadcasts on her YouTube channel. Specifically:

The defendant shared details of the confidential PPO Hearing during a live broadcast titled "Black Tea Sector: Teddy Bundy! The Real Tea April 9" (Exhibit C).

The defendant altered the background of an image depicting the plaintiff during her closed hearing testimony, without modifying the plaintiff's actual likeness or appearance, and subsequently published the altered image in a monetized YouTube video, falsely claiming that these changes constitute "Fair Use" and transformation of the original work. (Exhibit D).

The defendant created and disseminated explicit "Deepfake" pornographic content using the plaintiff's likeness on ICANTICANT.COM and the YouTube channel "Unhinged With Bundy" (Exhibits E and F).

Exploitation:

The defendant used the copyrighted material to humiliate the plaintiff, harm her reputation, and cause emotional distress. The defendant also profited from these actions through monetization on social media platforms (Exhibit G).

Additional Information:

Relief Requested

An injunction prohibiting the defendant from further use or dissemination of the plaintiff's copyrighted material.

Statutory or actual damages, including profits derived from the infringement, under 17 U.S.C. § 504.

Attorney's fees and costs under 17 U.S.C. § 505.

Compensatory damages for emotional distress caused by the dissemination of explicit deepfake pornography.

Any additional relief deemed appropriate by the court.

Count 2: Defamation and Privacy Violations

Between April 23, 2022, and December 12, 2024, Defendant Danielle Robertson published multiple defamatory statements and unauthorized personal information about Plaintiff, Sybrena Evans, on social media platforms including YouTube, Instagram, X, Stationhead, and her websites (MessyDani.Com and ICANTICANT.COM). These statements falsely portrayed the plaintiff as a criminal, an unfit medical professional, and a person with severe character flaws—claims that are entirely false and maliciously intended to harm her reputation and career.

The defendant also unlawfully disclosed sensitive personal information, including the plaintiff's home address, Social Security number, and professional license details, exposing her to harassment, threats, and potential harm. Specific incidents of these defamatory statements and privacy violations are documented to support these claims.

Facts Supporting the Claim:

Beginning May 5, 2022, Defendant Danielle Robertson released a series titled "Single Black Female," falsely portraying Plaintiff, Sybrena Evans, as a psychopathic serial killer like Ted Bundy and giving her the defamatory nickname "Teddy Bundy." This defamatory narrative continues to this day. (Exhibit H)

On April 10, 2023, defendant published "Unsolved Michigan Cold Cases" Episodes One and Two, falsely accusing plaintiff of stalking neighbors, being involved in a homicide, and calling her "A Black Karen" associated with other Michigan crimes.(Exhibit I)

The defendant falsely accused plaintiff, a licensed physician assistant, of unethical behavior and cyberbullying in a public post, claiming she was under investigation by the Medical Board. The defendant encouraged signing a petition to permanently harm Plaintiff's professional reputation, explicitly intending it to appear in search results. (Exhibit J)

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Additional Information:

On August 21, 2022, Defendant Danielle Robertson, created the defamatory Twitter account "Public Awareness To Medical Malpractice" and falsely claimed that public figure Dr. Sybrena Kenan was found guilty of medical malpractice, damaging the plaintiff's professional reputation. (Exhibit K)

On April 8, 2023, the defendant created and distributed explicit deepfake pornography impersonating the plaintiff through a fabricated "OnlyFans" account with links to a Doodroid.net account file. The image was made using police body camera footage obtained during a fraudulent "Wellness Check" on October 3, 2022. (Exhibit L)

Defendant falsely claimed that plaintiff "gets drunk during her live streams," engages in inappropriate behavior, and urges others to file complaints to Michigan Medical Board alleging substance abuse, alcohol consumption, and mental illness. These baseless accusations constitute clear defamation intended to harm the plaintiff's reputation. (Exhibit M)

Each instance constitutes a deliberate effort to damage the plaintiff's personal and professional reputation and violate her privacy. The plaintiff submits supporting evidence, including screenshots of video recordings and publicly accessible posts, which are attached as exhibits to this complaint.

Relief Requested:

Injunction:

Prohibit the defendant from further defaming the plaintiff or violating her privacy.

Damages:

Compensatory and punitive damages for emotional distress, reputational harm, and professional losses.

Attorney's Fees and Costs:

Reimbursement for all legal expenses incurred.

Additional Relief:

Any further relief deemed appropriate by the court.

Additional Information:

Count 3: False Reports and Fraudulent Claims

Between October 2022 and September 2024, Defendant Danielle Robertson, also known as Dani Montana, filed multiple false reports against the plaintiff, Sybrena Evans, with law enforcement agencies, regulatory boards, and governmental organizations. These fraudulent claims were submitted to entities such as the Michigan Medical Board, Northville Police Department, and Crime Stoppers. The defendant's actions were calculated to disrupt the plaintiff's personal life, career, and professional standing.

Facts Supporting the Claim

Fraudulent Wellness Checks

October 3, 2022 - #22-28031: The defendant impersonated a relative of the plaintiff and initiated a fraudulent wellness check, falsely alleging mental health concerns. (Exhibit N) Responding officers recorded police body cam footage of the plaintiff at her residence, capturing her in a bathrobe. (Exhibit O)

The defendant obtained this footage through a Freedom of Information Act (FOIA) request, extracted private images, and published them without consent on her YouTube channel and websites (MessyDani.Com and ICANTICANT.COM).

June 13, 2023 - #23-15558: The defendant impersonated a relative of the plaintiff and initiated a second fraudulent wellness check, falsely alleging mental health concerns. (Exhibit P)

June 15, 2023 - #23-15718: the defendant falsely impersonated a neighbor to file a fraudulent report alleging animal cruelty and abuse against the plaintiff. This malicious act led to an unwarranted wellness check by police at the plaintiff's home. The false claims constitute defamation, harassment, and invasion of privacy, causing emotional distress and unfairly labeling the plaintiff as abusive. (Exhibit Q)

Similar false reports were made, leading to law enforcement interventions at the homes of the plaintiff's family members, causing distress and embarrassment.

The defendant published police body camera footage on public platforms to humiliate and defame the plaintiff. Despite repeated removals by YouTube for privacy violations, the defendant persistently re-uploaded the video footage and photos of the plaintiff in her bathrobe. (Exhibit R)

Fraudulent Regulatory Complaints

On or about September 12, 2023, the defendant submitted a complaint to the Michigan Medical Board, falsely alleging professional misconduct by the plaintiff without evidence. (Exhibit S)

The defendant solicits mass support for bogus malpractice claims filed against plaintiff and encourages others to file similar complaints. (Exhibit T)

On April 16, 2024, the Bureau of Professional Licensing informed the plaintiff that no violation of the Public Health Code could be substantiated, and the matter was closed. (Exhibit U)

Additional Information:

On April 22, 2024, following the Medical Licensing Board's decision on April 16, 2024, to close the case against Plaintiff Sybrena Evans, the PPO Petitioner filed a new complaint with the Medical Licensing Board. This action appears to have been in retaliation for the Board's closure of the initial claim and the court's denial of the PPO Petitioner's request for a personal protection order against the plaintiff. (Exhibit V)

The Defendant, Danielle Robertson, was notified of this second complaint by the PPO Petitioner and subsequently posted about it on her platform, revealing their coordinated efforts. Their actions demonstrate a joint attempt to revoke the plaintiff's physician assistant license and harm her professional reputation. The defendant's public reaction, including expressions of anger over the Board's and the court's decisions, further supports evidence of a conspiracy between the defendant and the PPO Petitioner to retaliate against the plaintiff. (Exhibit W)

Following the Medical Board's decision to close the initial claim, the defendant, enraged by the outcome, escalated her efforts by filing additional unfounded complaints against the plaintiff with the Michigan Medical Board. These claims, filed on June 11 and September 16, 2024, were similarly baseless and aimed at revoking the plaintiff's medical license. Despite the Board finding no merit in the defendant's earlier claims, she persisted in her campaign to damage the plaintiff's professional standing. (Exhibit X)

These complaints jeopardized the plaintiff's medical license and professional standing, causing reputational harm and financial strain.

Exploitation of False Reports

The defendant monetized the outcomes of her fraudulent claims by publicizing them on social media platforms, including YouTube and her personal websites.

Posts and videos featuring these reports were used to further defame the plaintiff and generate attention and income for the defendant at the plaintiff's expense.

Relief Requested:

Injunction:

A court order barring the defendant from filing additional false reports or disseminating the outcomes of prior reports.

Damages:

Compensatory damages for emotional distress, reputational harm, and professional losses.

Punitive damages to deter the defendant from engaging in similar misconduct in the future.

Attorney's Fees and Costs:

Reimbursement for all legal expenses incurred by the plaintiff in addressing the defendant's actions.

Additional Relief:

Any other relief the court deems necessary to address the harm caused by the defendant.

Additional Information:

Count 4: Cyberbullying and Harassment

From July 2022 to November 2024, Defendant Danielle Robertson, also known as Dani Montana, engaged in a deliberate and targeted campaign of cyberbullying and harassment against Plaintiff Sybrena Evans. This campaign included filing nearly 200 fraudulent copyright claims, impersonating others, and inciting her followers to harass the plaintiff online, causing significant harm to the plaintiff's reputation, emotional well-being, and livelihood.

Facts Supporting the Claim:

Fraudulent Copyright Claims:

On or around July 17, August 1, and August 8, 2022, the defendant filed 35 fraudulent copyright claims against the plaintiff's YouTube channels UNWINEWITHTEDDY and RunTellThatToo, impersonating YouTuber NoseyHeauxLive and falsely claiming ownership of the plaintiff's content. (Exhibit Y)

Between September 6 and December 27, 2023, Defendant Danielle Robertson submitted more than 100 fraudulent copyright claims, falsely impersonating French author Sybille Titeux de la Croix and others. These claims targeted the plaintiff's channel avatar and videos featuring the image, leading to the termination of both UNWINEWITHTEDDY and RunTellThatToo YouTube channels. This disruption caused significant financial loss and emotional distress to the plaintiff. (Exhibit Z)

On March 02, 2024, the defendant Danielle Robertson filed a fraudulent copyright claim against Plaintiff Sybrena Evans to the CCB to create a "paper trail." (Exhibit A1)

On October 18, 2024, YouTube reinstated 13 videos after finding the defendant's copyright claims invalid. YouTube warned the defendant to provide precise identification of the allegedly copyrighted work. (Exhibits B1)

When the defendant failed to respond, her account was terminated. (Exhibits C1)

Following the termination, the defendant retaliated by "porn bombing" the plaintiff's YouTube channel, RunTellThatToo. (Exhibit D1)

Encouragement of Online Harassment:

On February 16, 2023, the defendant published a "Wanted" poster depicting plaintiff in blue bathrobe and a YouTube video titled "Breaking News: Bundy's Divorce and Skate Rink Lawsuit" to cyberbully and harass the plaintiff. The plaintiff's divorce documents were also published to (ICANTICANT.COM) This video violated the plaintiff's privacy and incited the defendant's followers to post defamatory content, resulting in a surge of online harassment. (Exhibit E1)

The defendant also published false allegations on social media, portraying the plaintiff as harmful to others, further inciting harassment. (Exhibit F1)

Additional Information:

Explicit Threats to Reputation:

In February 2023, the defendant publicly declared her intent to destroy the plaintiff's professional and personal reputation through intimidation and online cyberbullying, threats and intimidation. (Exhibit G1)

Monetization of Harassment:

From May 2022 to December 2024, the defendant profited from her cyberbullying activities by monetizing defamatory and harassing content through YouTube and other platforms, earning income from advertisements and viewer engagement.

Relief Requested:

Injunction:

A court order requiring the defendant to cease all forms of cyberbullying, harassment, and defamation against the plaintiff.

Compensatory Damages:

For emotional distress, reputational harm, and lost income resulting from the defendant's actions.

Punitive Damages:

To deter the defendant from engaging in similar behavior in the future.

Attorney's Fees and Costs:

Reimbursement for all legal expenses incurred by the plaintiff.

Additional Relief:

Any other remedies deemed appropriate by the court to address the harm caused by the defendant.

Count 5: Impersonation of Others to Commit Fraud

Between March 4, 2023, and November 4, 2023, Defendant Danielle Robertson executed a deliberate campaign of impersonation and deceit to suppress the plaintiff's content and manipulate public perception of her identity. The defendant's actions were designed to mislead platforms, obstruct the plaintiff's work, and inflict reputational harm. The following facts establish a clear pattern of fraudulent conduct.

Additional Information:

Facts Supporting The Claim

On or around March 9, 2023, YouTube notified Plaintiff Sybrena Evans of privacy complaints filed against her content. The complaints, believed to have been submitted by Defendant Danielle Robertson, alleged that the plaintiff's use of publicly sourced photos violated the complainant's privacy. (Exhibits H1 and I1).

On March 12, 2023, YouTube denied Defendant Danielle Robertson's privacy complaints, confirming the content did not violate its privacy policies and would remain on the platform. (Exhibit J1)

On or around March 13, 2023, The Defendant, Danielle Robertson, later admitted to filing a false privacy complaint impersonating Danielle Elizabeth Allen. In her submissions to YouTube. She acknowledged knowingly falsifying legal documents. In her admission, the defendant revealed that her primary intent was to have the photos removed, asserting that her actions were intended to protect Danielle Elizabeth Allen. This admission demonstrates that the defendant deliberately manipulated YouTube's processes by fabricating her identity and filing false claims. (Exhibit K1)

The defendant's fraudulent privacy claims to YouTube purporting to be Danielle Elizabeth Allen, directly contradicted her own statements in a March 4, 2023, video titled "HEAR HER TV, MOMMY BITER MESSAGED ME! I GUESS JAGUAR WRIGHT CONTENT DRIED UP. THE BIRD BRAIN," uploaded to her YouTube channel "For The Basics," where she explicitly denied being Danielle Elizabeth Allen. (Exhibit L1)

Despite the photos being public and the Plaintiff's content protected as Fair Use, the Defendant knowingly exploited YouTube's privacy complaint system to further her fraudulent agenda, causing harm to the Plaintiff's reputation and professional work.

The Defendant's calculated actions demonstrate an intent to deceive, manipulate, and harm the Plaintiff through false claims and impersonation.

Relief Requested:

Injunction prohibiting the Defendant from filing fraudulent complaints and impersonating others.

Compensatory damages for reputational harm and financial losses.

Punitive damages to deter future impersonation and fraud.

Attorney's fees and additional relief as deemed appropriate by the court.

Additional Relief: Any further remedies deemed appropriate by the court.

Additional Information:

Count 6: Conspiracy to Commit Fraud and Cause Emotional Distress

Between November 5, 2023, and April 30, 2024, Defendant Danielle Robertson, acting under anonymity, conspired with an individual in Detroit to file a false Personal Protection Order against Plaintiff Sybrena Evans. This scheme aimed to harm the plaintiff personally and professionally by creating a fraudulent paper trail to support defamatory claims and discredit the plaintiff with regulatory bodies. Soliciting thousands of followers to sign a petition in support of this harmful petition.

Facts Supporting the Claim

On or about April 2, 2024, Defendant Danielle Robertson published a post on her website, ICANTICANT.COM, announcing a forthcoming PPO hearing involving the Plaintiff, despite the Plaintiff not having publicly disclosed such information. (Exhibit M1)

On April 9, 2024, the defendant collaborated with the PPO petitioner, acting as her proxy, to file a false PPO request to the court. The petition's language and accusations closely align with the defendant's rhetoric, strongly indicating that Danielle Robertson either authored or heavily influenced its content. The defendant's anonymity allowed her to avoid personal accountability while using others to execute her harmful agenda. (Exhibit N1)

On or around April 27, 2024, the defendant fabricated a second false PPO and published it on her website, ICANTICANT.COM, presenting it as legitimate to deceive her audience and perpetuate a false narrative. This fraudulent PPO was used to damage the plaintiff's reputation. (Exhibit O1)

On October 14, 2023, the Defendant Danielle Robertson created a "Change.org" petition against Plaintiff Sybrena Evans, falsely alleging unethical behavior to damage her professional reputation as a Physician Assistant. The defendant defamed the plaintiff by accusing her of collaborating with a violent criminal and supporting physical harm to others. (Exhibit P1)

In her November 4, 2023, video titled "WHO IS DANIELLE ELIZABETH ALLEN! SYBRENA'S PETITION! TEDDY BUNDY'S OBSESSION! BLACK TEA SECTOR DRAMA," the defendant, Danielle Robertson, maliciously defames the plaintiff's professional character, portraying her as a mass "stalker" intent on harming others, in a defamatory petition published on Change.org. (Exhibit Q1)

On February 10, 2023, the defendant posted my late brother's obituary photo on her YouTube channel "For The Basics" aka DaniMontanal. In another video, "Step Into The Bad Side" the defendant Danielle Robertson posted my brother's obituary photo. The defendant blamed the plaintiff for the death of her brother, going so far as to suggest the plaintiff murdered him. This caused severe emotional distress. (Exhibit R1)

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Additional Information:

Relief Requested:

Injunction: Prohibiting the defendant and her collaborators from engaging in further harmful actions against the plaintiff.

Compensatory Damages: For emotional distress, reputational harm, and financial losses caused by the defendant's actions.

Punitive Damages: To deter the defendant and others from engaging in similar conspiracies in the future.

Attorney's Fees and Costs: Reimbursement for all legal expenses incurred due to the defendant's malicious conduct.

Additional Relief: Any further remedies deemed appropriate by the court.

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Additional Information:

EXHIBITS

Count 1: Copyright Infringement

Exhibits A-G

Count 2: Defamation and Privacy Violations

Exhibits H-M

Count 3: False Reports and Fraudulent Claims

Exhibits N-X

Count 4: Cyberbullying and Harassment

Exhibits Y-Z, A1, B1, C1, D1, E1, F1, and G1

Count 5: Impersonation of Others to Commit Fraud

Exhibits H1, I1, J1, K1, and L1

Count 6: Conspiracy to Commit Fraud and Cause Emotional Distress

Exhibits M1, N1, O1, P1, Q1 and R1

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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. See attached "ADDITIONAL INFORMATION" pages following below.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

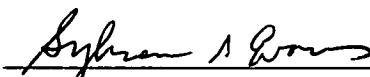
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: December 23, 2024

Signature of Plaintiff

Printed Name of Plaintiff



Sybrena Evans

Additional Information:

IV. Relief

1. Copyright Infringement

Relief Requested:

Actual Damages: \$50,000 for lost income due to fraudulent copyright claims that disrupted the plaintiff's YouTube channels, including loss of monetization and viewership.

Basis: Defendant's repeated fraudulent copyright strikes led to the termination of the "UNWINEWITHTEDDY" and "RunTellThatToo" channels, resulting in substantial financial harm.

Punitive Damages: \$75,000 to deter the defendant and others from engaging in similar fraudulent actions.

Reason: The defendant acted willfully and maliciously, knowing the claims were false, to harm the plaintiff's business.

Injunction: A court order preventing the defendant from filing further fraudulent copyright claims.

2. Defamation and Privacy Violations

Relief Requested:

Actual Damages: \$100,000 for harm to the plaintiff's personal and professional reputation, emotional distress, and loss of business opportunities.

Basis: False and defamatory statements, including allegations of abuse, caused reputational damage and led to public harassment, financial losses, and emotional harm.

Punitive Damages: \$150,000 to punish the defendant and prevent similar conduct in the future.

Reason: The defendant's actions were intentional, malicious, and demonstrated a reckless disregard for the truth.

Injunction: A court order requiring the defendant to remove all defamatory content and cease further publications.

3. False Reports and Fraudulent Claims

Relief Requested:

Actual Damages: \$30,000 for costs associated with defending against fraudulent claims and for emotional distress caused by false wellness checks, regulatory reports, and impersonations.

Basis: Defendant's false reports led to police investigations, public accusations, and personal disruption.

Punitive Damages: \$50,000 to hold the defendant accountable for abusing legal and regulatory systems to harass the plaintiff.

Reason: Defendant knowingly filed false reports with the intent to cause harm.

Injunction: A court order prohibiting the defendant from filing further false reports or claims

Additional Information:

4. Cyberbullying and Harassment

Relief Requested:

Actual Damages: \$75,000 for loss of business revenue, emotional distress, and costs incurred to repair the plaintiff's professional reputation.

Basis: Defendant's targeted harassment, including fraudulent copyright claims, defamatory content, and incitement of online attacks, disrupted the plaintiff's livelihood and caused severe emotional harm.

Punitive Damages: \$100,000 to deter the defendant from further harassment and cyberbullying.

Reason: The defendant monetized harassment campaigns and acted with malicious intent over an extended period.

Injunction: A court order requiring the defendant to cease all cyberbullying and harassment activities, including directing others to engage in similar behavior.

5. Impersonation of Others To Commit Fraud

Relief Requested:

Actual Damages: \$50,000 for financial losses and reputational harm caused by the defendant's impersonation, including costs incurred to defend against fraudulent claims and the impact on the plaintiff's business operations.

Basis: The defendant used false identities and impersonated other to file fraudulent copyright claims, disrupt the plaintiff's You

Tube channels (UNWINEWITHTEDDY and RunTellThatToo), and commit acts of fraud to harm the plaintiff's professional and personal reputation.

Punitive Damages: \$100,000 to punish the defendant for her malicious conduct and deter future acts of Impersonation and fraud.

Reason: The defendant acted with clear intent to deceive, leveraging impersonation to execute fraudulent claims and cause significant harm to the plaintiff over an extended period.

Injunction: A court order prohibiting the defendant from impersonating others, filing fraudulent claims, or engaging in any actions involving deception or fraud against the plaintiff or her business entities.

MLED ProSe 1 (Rev 5/16) Complaint for a Civil Case

Additional Information:

6. Conspiracy to Commit Fraud and Cause Emotional Distress

Relief Requested:

Actual Damages: \$100,000 for financial losses, reputational damage, and emotional distress suffered by the plaintiff due to the coordinated and malicious conspiracy.

Basis: The defendant, in collaboration with others, conspired to file fraudulent claims, disseminate defamatory content, and engage in cyberbullying which disrupted the plaintiff's businessess (UNWINEWITHTEDDY and RunTellThatToo) and caused severe emotional and financial harm.

Punitive Damages: \$150,000 to hold the defendant accountable for orchestrating and participating in the conspiracy and to deter similar coordinated fraudulent activities in the future.

Reason: The defendant's actions were calculated, malicious, and carried out with the intent to harm the plaintiff's livelihood, reputation and emotional well-being.

Injunction: A court order prohibiting the defendant and any co-conspirators from engaging in further conspiratorial acts, including fraud, harassment, or defamatory conduct against the plaintiff or her associated entities.

Attorney's Fees and Cost: Reimbursement for legal expenses incurred in addressing the conspiracy and protecting the plaintiff's rights and interests.

JS 44 (Rev. 10/20)

CIVIL COVER SHEET

County in which action arose: _____

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Syrena Evans
Syrena Kenan and Associates, Inc. dba/UNWINEWITHTEDDY

(b) County of Residence of First Listed Plaintiff Wayne
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (First Name, Address, and Telephone Number)

DEFENDANTS

1. Jane Doe, also known as Danielle Robertson, Dani Robertson, Dani Montana, TruthTeller Dani, Lori Davis and Danielle Robertson, LLC.
2. Jane Does 1-10

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known):

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | | | |
|---|----------------------------|----------------------------|---|---------------------------------------|---------------------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in This State | <input checked="" type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care: Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Adhesion Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 155 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abandoned New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 850 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWCDIWW (405(g)) <input type="checkbox"/> 864 SSBD Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing: Accommodations <input type="checkbox"/> 445 Amer. w/ Disabilities - Employment <input type="checkbox"/> 446 Amer. w/ Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS <input type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1661 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable-Sat TV <input type="checkbox"/> 550 Securities Commodity Exchange <input type="checkbox"/> 590 Other Statutory Actions <input type="checkbox"/> 591 Agricultural Acts <input type="checkbox"/> 593 Environmental Matters <input type="checkbox"/> 595 Freedom of Information Act <input type="checkbox"/> 596 Arbitration <input type="checkbox"/> 599 Administrative Procedure Act Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	

V. ORIGIN (Place an "X" in One Box Only)

- ☐ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Recaptured
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Methodist Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

17 U.S.C. § 102, 17 U.S.C. § 501, 17 U.S.C. § 504, and 17 U.S.C. § 505

Brief description of cause:

Under the 1976 Act, section 102 says that copyright protection extends to original works that are fixed in a tangible medium of expression.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

December 23, 2024

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

PURSUANT TO LOCAL RULE 83.11

1. Is this a case that has been previously dismissed?

☐ Yes

☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

2. Other than stated above, are there any pending or previously discontinued or dismissed companion cases in this or any other court, including state court? (Companion cases are matters in which it appears substantially similar evidence will be offered or the same or related parties are present and the cases arise out of the same transaction or occurrence.)

☐ Yes

☒ No

If yes, give the following information:

Court: _____

Case No.: _____

Judge: _____

Notes :

EXHIBITS

Exhibit A: Copyright Infringement

"These materials are protected as personal works under the Copyright Act of 1976, 17 U.S.C. §§ 101 et seq."

Copyright Infringement Notification Confirmation

Thank you for your submission. It is under review to ensure it is valid and includes all required elements. We will reply to this email when we've taken action on your request. You can also check on the status of your takedown request in the 'Removal requests' tab which is found in the Copyright section of your channel.

Here is the information you filled in:

- Copyright Owner Name (Company Name if applicable): Sybrena Kenan and Associates, Inc. dba/ UNWINEWITHTEDDY
- Your Full Legal Name (Aliases, usernames or initials not accepted): Sybrena Kenan (Evans)
- Your Title or Job Position (What is your authority to make this complaint?): President
- Address:
 - 17710 Lakeview Cr.
 - Northville, MI 48168
 - US
- Username: UNWINEWITHTEDDY
- Email Address: unwinewithteddy@gmail.com
- Phone: (248) 362-1300

- URL of allegedly infringing video to be removed: <https://www.youtube.com/watch?v=UX7Qgbq0Gu8>
- Describe the work allegedly infringed: Other
 - Title of copyrighted work: Hearing on Petition for Personal Protection Order
 - Type of copyrighted work: Video Image
 - Additional information: I submit a DMCA takedown request for an infringing YouTube video featuring copyrighted material from my closed PPO hearing (Case No. 24-██████████) violating law and court orders. Timestamps upon req.
 - Where does the content appear? Entire video

- Country where copyright applies: US
- I state UNDER PENALTY OF PERJURY that:
 - I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
 - I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
 - This notification is accurate.
 - I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
 - I understand that abuse of this tool will result in termination of my YouTube channel.
- Authorized Signature: Sybrena Kenan (Evans)

- The YouTube Team

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



© 2021 [Google LLC d/b/a YouTube](#), 901 Cherry Ave, San Bruno, CA 94066

Plaintiff's takedown request response



Teddy Bear <winnew1teddy@gmail.com>
to YouTube

Sun, Dec 8, 3:00 PM (5 days ago) ☆ ☺ ↶ !

Hi YouTube Copyright,

The infringed content is a photo titled "Miss Evans," created and authored on April 9, 2024. This photograph features a Black woman wearing wire-framed glasses with a distinctive appearance. The infringing channel has copied and published this photograph on their YouTube channel without my authorization. The copyrighted visual artwork appears at the following timestamps: 00:00:00 - 00:15:48, 00:26:39 - 00:58:04.

The infringing channel has violated copyright law by using my photograph for commercial purposes, likely profiting from this unauthorized use. This misuse does not meet the criteria for fair use under copyright law, as the photograph is not being used for non-profit or educational purposes. Instead, its unauthorized use misleads viewers by falsely associating the content with me, causing confusion and harm to my brand. This infringement disrupts the legitimate use of my photo and damages my reputation. I respectfully request the immediate removal of the infringing content.

Sincerely,

Sybrena Kenan (Evans)



Hi,

Thank you for your response. We've reviewed it and provided updates below.

Request resolved

The video(s) listed below have already been removed. Because the content is unavailable, we are unable to take action on them.

Videos in question:

<https://www.youtube.com/watch?v=UX7Qgbq0Gu8>

We use a combination of automated systems and human reviews to process removal requests.

Defendant's Counter Notification Response

- <http://www.youtube.com/watch?v=UX7Qgbq0Gu8>

Display name of uploader: DANI MONTANA

The alleged infringing content is fully protected under Fair Use as defined by U.S. copyright law (17 U.S.C. § 107). I, Dani Montana, am the creator and owner of the content in question. Any clips used, if applicable, were not taken in their entirety and required significant creative input to produce. These clips were utilized for educational purposes, commentary, and criticism, all of which fall under the Fair Use exception. Fair Use Defense Transformative Use: The content is not a replication of the original but has been extensively transformed with commentary, critique, and original elements that provide new meaning and purpose. This transformative nature is fundamental to Fair Use protections. Limited Use: Only short segments of the original material were used, if any, and these were significantly edited, ensuring that the "heart" of the work was not taken or exploited. Purpose and Nature: The material was used to educate, critique, and discuss, which are core purposes protected by Fair Use. Market Effect: The content does not substitute or harm the market for the original material. Instead, it provides additional commentary, enhancing understanding and discussion. Copyright Ownership If a photograph is at issue, copyright ownership belongs to the photographer, not the subject, unless explicitly transferred. This is a well-established principle in copyright law. Prepared to Defend The video is a creative work, full of original content, extensive commentary, and transformative purpose. I am prepared to present evidence of its originality and transformative nature in court. I can provide documentation of my editing process, the limited use of any third-party material, and the educational and critical intent behind the work. This case falls squarely within Fair Use protections, and I am confident in defending this position.

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Danielle Robertson

Danielle Robertson
8 The Green STE A
Dover, Delaware 19907
United States

Danimontana2022@gmail.com

(860) 864-0028



Copyright Infringement Notification Confirmation

Thanks for contacting the YouTube Copyright compliance team.

If you believe that your copyrighted content is being used without authorization, you may submit a copyright takedown notice through our [webform](#). You can find the requirements for copyright takedown requests, and info about our copyright policy, in our [Copyright Center](#). Please make sure that you've given us all of the [required info](#) so we can process your request. If you opt to [prevent reuploads of removed videos](#), your email address, copyright owner name, and description of your allegedly infringed work may be shared with the uploader if their videos are prevented from uploading.

If you have concerns about harassment, your privacy, safety, or other abuse issues, [learn more about how to stay safe on YouTube](#). Or, you may submit a complaint regarding [other legal issues](#), including trademark and defamation.

We detected videos from your email and have started processing your request. If we missed any videos from your email, please file a new request. If your email has many video URLs, you may receive follow up responses.

Here is the list of videos we detected from your email:

- https://www.youtube.com/watch?v=thjggNJ_zf8

- The YouTube Team

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



© 2021 [Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066](#)

Plaintiff's takedown request response



Teddy Bear <unwnewthteddy@gmail.com>
to YouTube

Sun, Dec 8, 3:00 PM (5 days ago) ☆ 😊 ↩ ⋮

Hi YouTube Copyright,

The infringed content is a photo titled "Miss Evans," created and authored on April 9, 2024. This photograph features a Black woman wearing wire-framed glasses with a distinctive appearance. The infringing channel has copied and published this photograph on their YouTube channel without my authorization. The copyrighted visual artwork appears at the following timestamps: 01:34:08 - 02:33:08.

The infringing channel has violated copyright law by using my photograph for commercial purposes, likely profiting from this unauthorized use. This misuse does not meet the criteria for fair use under copyright law, as the photograph is not being used for non-profit or educational purposes. Instead, its unauthorized use misleads viewers by falsely associating the content with me, causing confusion and harm to my brand. This infringement disrupts the legitimate use of my photo and damages my reputation. I respectfully request the immediate removal of the infringing content.

Sincerely,

Sybrona Kenan (Evans)



Hi,

Thank you for your response. We've reviewed it and provided updates below.

Request resolved

The content listed below has been removed.

Videos in question:

https://www.youtube.com/watch?v=thjggNJ_zf8

We use a combination of automated systems and human reviews to process removal requests.

...

Defendant's Counter Notification Response

- http://www.youtube.com/watch?v=thjggNJ_zf8

Display name of uploader: DANI MONTANA

The alleged infringing content is fully protected under Fair Use as defined by U.S. copyright law (17 U.S.C. § 107). I, Dani Montana, am the creator and owner of the content in question. Any clips used, if applicable, were not taken in their entirety and required significant creative input to produce. These clips were utilized for educational purposes, commentary, and criticism, all of which fall under the Fair Use exception. Fair Use Defense Transformative Use: The content is not a replication of the original but has been extensively transformed with commentary, critique, and original elements that provide new meaning and purpose. This transformative nature is fundamental to Fair Use protections. Limited Use: Only short segments of the original material were used, if any, and these were significantly edited, ensuring that the "heart" of the work was not taken or exploited. Purpose and Nature: The material was used to educate, critique, and discuss, which are core purposes protected by Fair Use. Market Effect: The content does not substitute or harm the market for the original material. Instead, it provides additional commentary, enhancing understanding and discussion. Copyright Ownership If a photograph is at issue, copyright ownership belongs to the photographer, not the subject, unless explicitly transferred. This is a well-established principle in copyright law. Prepared to Defend The video is a creative work, full of original content, extensive commentary, and transformative purpose. I am prepared to present evidence of its originality and transformative nature in court. I can provide documentation of my editing process, the limited use of any third-party material, and the educational and critical intent behind the work. This case falls squarely within Fair Use protections, and I am confident in defending this position.

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Danielle Robertson

Danielle Robertson
8 The Green STE A
Dover, Delaware 19901
United States

Danimontana2022@gmail.com

(860) 864-0027



Copyright Infringement Notification Confirmation

Thanks for contacting the YouTube Copyright compliance team.

If you believe that your copyrighted content is being used without authorization, you may submit a copyright takedown notice through our [webform](#). You can find the requirements for copyright takedown requests, and info about our copyright policy, in our [Copyright Center](#). Please make sure that you've given us all of the [required info](#) so we can process your request. If you opt to [prevent reuploads of removed videos](#), your email address, copyright owner name, and description of your allegedly infringed work may be shared with the uploader if their videos are prevented from uploading.

If you have concerns about harassment, your privacy, safety, or other abuse issues, [learn more about how to stay safe on YouTube](#). Or, you may submit a complaint regarding [other legal issues](#), including trademark and defamation.

We detected videos from your email and have started processing your request. If we missed any videos from your email, please file a new request. If your email has many video URLs, you may receive follow up responses.

Here is the list of videos we detected from your email:

- <https://www.youtube.com/watch?v=uicvxu6Uyzg>

- The YouTube Team

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



© 2021 [Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066](#)

Plaintiff's takedown request response



Teddy Bear - unreviewed@YouTube.com
to YouTube

Sun, Dec 8, 10:07 PM (UTC-08:00) ☆ ⓘ ↻

Hi YouTube Copyright,

The infringing content is a photo titled "Miss Evans" created and authored on April 9, 2024. This photograph features a Black woman wearing wire-framed glasses with a distinctive appearance. The infringing channel has copied and published this photograph on their YouTube channel without my authorization. The copyrighted visual artwork appears at the following timestamps: 00:00:00 - 00:55:15.

The infringing channel has violated copyright law by using my photograph for commercial purposes, likely profiting from the unauthorized use. This misuse does not meet the criteria for fair use under copyright law, as the photograph is not being used for non-profit or educational purposes. Instead, its unauthorized use misleads viewers by falsely associating the content with me, causing confusion and harm to my brand. This infringement disrupts the legitimate use of my photo and damages my reputation. I respectfully request the immediate removal of the infringing content.

Sincerely,

Byronne Kanan (Evans)

...



Hi,

Thank you for your response. We've reviewed it and provided updates below.

Request resolved

The content listed below has been removed.

Videos in question:

<https://www.youtube.com/watch?v=uicvXu6Uyzg>

Copyright © 2021 Google LLC. All rights reserved. YouTube is a trademark of Google LLC.

We use a combination of automated systems and human reviews to process removal requests.

...

[Help Center](#) · [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



© 2021 Google LLC d/b/a YouTube, 901 Cherry Ave, San Bruno, CA 94066

...

Defendant's Counter Notification Response

- <http://www.youtube.com/watch?v=uicvxu6Uyzg>

Display name of uploader: DANI MONTANA

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I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Danielle Robertson

Danielle Robertson
8 The Green STE A
Dover, Delaware 19901
United States

DaniMontana2022@gmail.com



Copyright Infringement Notification Confirmation

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If you have concerns about harassment, your privacy, safety, or other abuse issues, [learn more about how to stay safe on YouTube](#). Or, you may submit a complaint regarding [other legal issues](#), including trademark and defamation.

We detected videos from your email and have started processing your request. If we missed any videos from your email, please file a new request. If your email has many video URLs, you may receive follow up responses.

Here is the list of videos we detected from your email:

- <https://www.youtube.com/watch?v=AjCZaPkEODY>

- The YouTube Team

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



Plaintiff's takedown request response



Teddy Bear <unwiner@teddy@gmail.com>
to YouTube -

Dec 5, 2024, 7:59 PM (5 days ago) ☆ ☺ ↶ ⋮

Hi YouTube Copyright,

The infringed content is a photo titled "Miss Evans," created and authored on April 9, 2024. This photograph features a Black woman wearing wire-framed glasses with a distinctive appearance. The infringing channel has copied and published this photograph on their YouTube channel without my authorization. The copyrighted visual artwork appears at the following timestamps: 01:12:18 - 01:13:20.

The infringing channel has violated copyright law by using my photograph for commercial purposes, likely profiting from this unauthorized use. This misuse does not meet the criteria for fair use under copyright law, as the photograph is not being used for non-profit or educational purposes. Instead, its unauthorized use misleads viewers by falsely associating the content with me, causing confusion and harm to my brand. This infringement disrupts the legitimate use of my photo and damages my reputation. I respectfully request the immediate removal of the infringing content.

Sincerely,

Sybrene Kenen (Evans)



Hi ,

Thank you for your response. We've reviewed it and provided updates below.

Request resolved

The content listed below has been removed.

Videos in question:

<https://www.youtube.com/watch?v=AjCZaPkEODY>

We use a combination of automated systems and human reviews to process removal requests.

...

Defendant's Counter Notification Response

- <http://www.youtube.com/watch?v=AjCZaPkEODY>

Display name of uploader: DANI MONTANA

The alleged infringing content is fully protected under Fair Use as defined by U.S. copyright law (17 U.S.C. § 107). I, Dani Montana, am the creator and owner of the content in question. Any clips used, if applicable, were not taken in their entirety and required significant creative input to produce. These clips were utilized for educational purposes, commentary, and criticism, all of which fall under the Fair Use exception. Fair Use Defense Transformative Use: The content is not a replication of the original but has been extensively transformed with commentary, critique, and original elements that provide new meaning and purpose. This transformative nature is fundamental to Fair Use protections. Limited Use: Only short segments of the original material were used, if any, and these were significantly edited, ensuring that the "heart" of the work was not taken or exploited. Purpose and Nature: The material was used to educate, critique, and discuss, which are core purposes protected by Fair Use. Market Effect: The content does not substitute or harm the market for the original material. Instead, it provides additional commentary, enhancing understanding and discussion. Copyright Ownership If a photograph is at issue, copyright ownership belongs to the photographer, not the subject, unless explicitly transferred. This is a well-established principle in copyright law. Prepared to Defend The video is a creative work, full of original content, extensive commentary, and transformative purpose. I am prepared to present evidence of its originality and transformative nature in court. I can provide documentation of my editing process, the limited use of any third-party material, and the educational and critical intent behind the work. This case falls squarely within Fair Use protections, and I am confident in defending this position.

I swear, under penalty of perjury, that I have a good faith belief the material was removed due to a mistake or misidentification of the material to be removed or disabled.

I consent to the jurisdiction of the Federal District Court for the district in which my address is located, or if my address is outside of the United States, the judicial district in which YouTube is located, and will accept service of process from the claimant.

Danielle Robertson

Danielle Robertson
8 The Green STE A
Bend, Oregon 19901
United States

danimontana2022@gmail.com

(860) 864-0028

Exhibit B: Notice of Hearing on Petition for Personal Protection Order – Electronic Hearing Information “It is unlawful to record any Court Proceeding.”

STATE OF MICHIGAN THIRD JUDICIAL CIRCUIT WAYNE COUNTY	NOTICE OF HEARING ON PETITION FOR PERSONAL PROTECTION ORDER	CASE NO. [REDACTED]
Court address 1801 CAYNE, 2 Woodward Ave., Detroit, MI 48226		Court telephone no. 313-224-8120

Petitioner name [REDACTED]	[REDACTED]
TO: Sybrena Kenan Evans	

You are notified that the petitioner has requested a Personal Protection Order be issued against you. A hearing has been scheduled to decide whether or not to issue the Personal Protection Order.

Judge: Docket Judge PPO
 Date: 4/9/2024
 Time: 10:30 a.m.
 Location: Zoom Hearing, Please see attached instructions.

If you require special accommodations to use the court because of a disability or if you require a foreign language interpreter to help you fully participate in court proceedings, please contact the court immediately to make arrangements.

Date _____ Signature _____

TO THE PETITIONER:

The respondent must be served with this notice at least one day before the hearing date if you are asking for a domestic relationship PPO(CC 375 or CC 375M) or a nondomestic stalking PPO(CC 377 or CC 377M). If you filed a petition for a nondomestic sexual assault PPO(CC395 or CC395M), the respondent must be served with this notice at least two days before the hearing. **YOUR PROOF OF SERVICE MUST BE FILED WITH THE COURT AT PPO@3RJdc.org AT LEAST ONE DAY PRIOR TO THE HEARING OR YOUR HEARING MAY BE ADJOURNED OR DISMISSED.**

If the respondent is under 18 years of age, you must also serve the parents, guardians, or custodians of the respondent.

IMPORTANT: If either party has evidence they wish for the Court to review at your hearing, submit each item in pdf format properly labeled to PPOCourt@3rdcc.org at least 3 days prior to hearing. Any evidence not properly submitted will not be considered. E-mail subject line must read: Date of Hearing: Case Name, Case Number, Petitioner/Respondent Evidence.

Approved: SCAO
 Form CC 381, Rev. 3/23
 MCR 1705(A)(3)(H)
 Page 1 of 1

Distribute form to:
 Court
 Judge/Assignment Clerk
 Respondent
 Petitioner
 Return

ELECTRONIC HEARING INFORMATION

Dear Litigant/Counsel of Record,

The Family Division Court is conducting all court proceedings remotely by Zoom video except as otherwise ordered by the Judge or Referee. You are receiving this communication due to your upcoming hearing as stated on the previous page.

Case NO:	24 [REDACTED]
Judge:	Docket Judge PPO
Hearing Type:	PPO PETITION
Date:	4/9/2024
Time:	10:30 AM

ZOOM HEARING PROCEDURE:

1. Join the Zoom Hearing. All parties should do the following to join your hearing at the time of the call:

- Go to www.3rdcc.org/zoom or you can find the link under "Essential Links".
- Click on "Family Division- Domestic"
- Click "Join Meeting" next to YOUR corresponding Judge's Name.

DOWNLOAD THE ZOOM APP FROM GOOGLE PLAY OR THE APP STORE.

IF YOU ARE UNABLE TO CONNECT TO THE MEETING OR REQUIRE AN INTERPRETER, PLEASE CONTACT YOUR JUDGES COURTROOM DIRECTLY AT _____ THE COURT'S GENERAL EMAIL ADDRESS IS PPO@3rdcc.org

2. Enter your name and case number for "Your Name". For example, "John Doe 20-123456-DO".
3. Waiting Room. You will be immediately placed into a waiting room into your Assigned Judge's "Personal Meeting Room". *Do not hang up or leave the meeting.*
4. You will be brought "Into" the virtual hearing at or around the designated time.
5. As this is a Court proceeding, professional decorum is expected on ALL Zoom hearings including, but not limited to, appropriate dress, background view, and NO driving, smoking, eating, drinking, or chewing gum during the proceeding. Please limit all background noise, distractions, and third party interactions. No minor children are to hear or oversee your Zoom hearing at any time. There is to be no recording of Zoom hearings; it is unlawful to record any Court proceeding.
6. Once you are done with the virtual hearing, click "Leave Meeting".

For information on all domestic filings and Personal Protection Order filings, you can visit the Court's website at <http://www.3rdcc.org/divisions/family-domestic#/list> for detailed instructions under the following links: "[Family Domestic/FOC Filing Instructions](#)" and "[Personal Protection Order Filing Instructions](#)"

STATE OF MICHIGAN 3RD JUDICIAL CIRCUIT WAYNE COUNTY	PETITION FOR PERSONAL PROTECTION ORDER (NONDOMESTIC)	CASE NO. and JUDGE
Court address Coleman A. Young Municipal Center, 2 Woodward Avenue, Detroit, MI 48226		Court telephone no. (313) 224-5261
(A) Petitioner's name <div style="background-color: black; width: 100%; height: 40px;"></div>	v	Respondent's name, address, and telephone no. <div style="background-color: black; width: 100%; height: 40px;"></div>
Age 50		Age 65

1. The petitioner and respondent have never been married, resided in the same household together, had a child in common, or had a dating relationship with one another.
- (B) 2. ☐ The respondent is required to carry a firearm in the course of his/her employment. ☒ Unknown.
- (C) 3. a. There ☐ are ☒ are not other pending actions in this or any other court regarding the parties.
- | | | |
|-------------|--|---------------|
| Case number | Name of court, county, and state or province | Name of judge |
| | | |
- b. There ☐ are ☒ are not orders/judgments entered by this or any other court regarding the parties.
- | | | |
|-------------|--|---------------|
| Case number | Name of court, county, and state or province | Name of judge |
| | | |
- (D) 4. I need a personal protection order because: Explain what has happened (attach separate sheets).
Please see attached "Statement of Facts"
- (E) 5. I make this petition under the authority of MCL 600.2950a(1) and ask the court to grant a personal protection order prohibiting the respondent from
- ☒ a. stalking me as defined by MCL 750.411h and MCL 750.411i, which includes but is not limited to
- ☒ following me or appearing within my sight.
 - ☒ appearing at my workplace or residence.
 - ☒ approaching or confronting me in a public place or on private property.
 - ☒ entering onto or remaining on property owned, leased, or occupied by me.
 - ☒ sending mail or other communications to me.
 - ☒ contacting me by telephone.
 - ☒ placing an object on or delivering an object to property owned, leased, or occupied by me.
- ☒ b. threatening to kill or physically injure me.
- ☒ c. purchasing or possessing a firearm.
- ☒ d. posting a message through the use of any medium of communication, including the Internet or a computer or any electronic medium, pursuant to MCL 750.411s.
- ☒ e. other: See "Other Matter" in Attachment

Exhibit C: April 11, 2024 – Defendant's Live Broadcast Sharing Confidential PPO Hearing Details

Dani Montana YouTube "Black Tea Sector: Teddy Bundy! The Real Tea April 9."

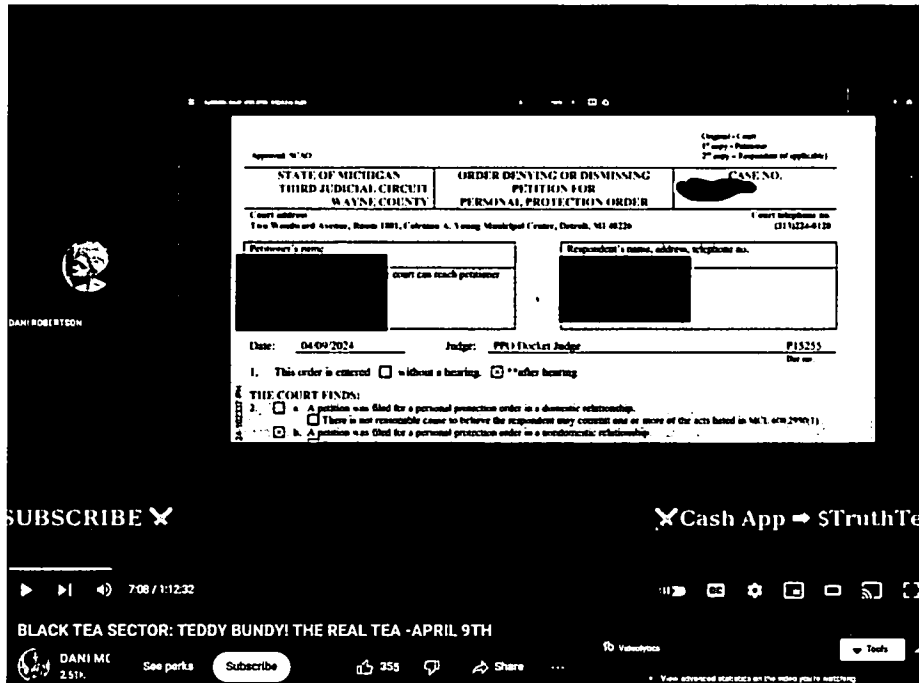


Exhibit D: Copyright Infringement – Unauthorized Use and Distribution

"The Defendant Danielle Robertson aka Dani Montana misappropriated the Plaintiff Sybrena Evans image, unlawfully obtained from a PPO hearing, removed the background without altering the likeness, and published the untransformed work in a monetized YouTube video—undermining claims of fair use."

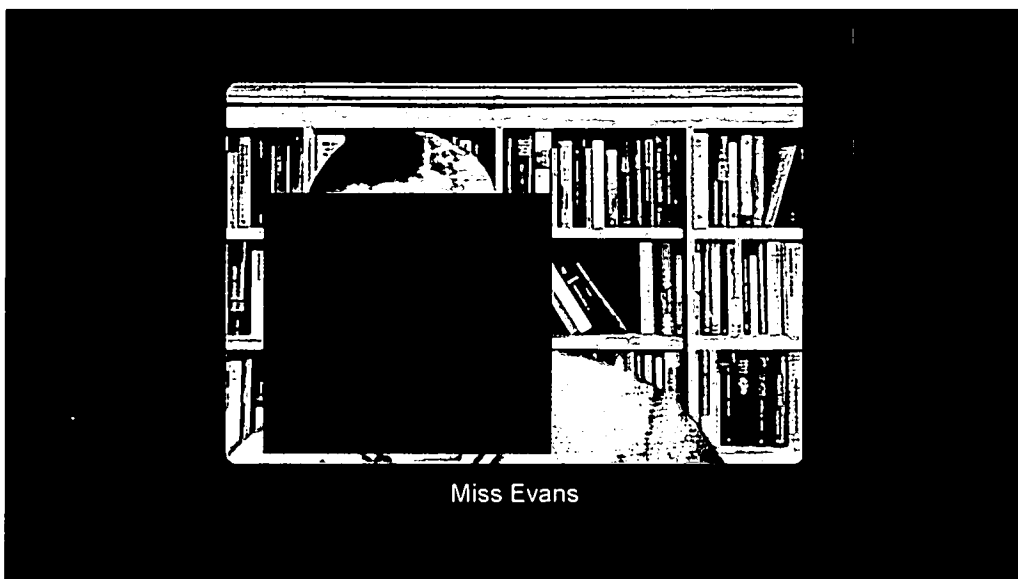


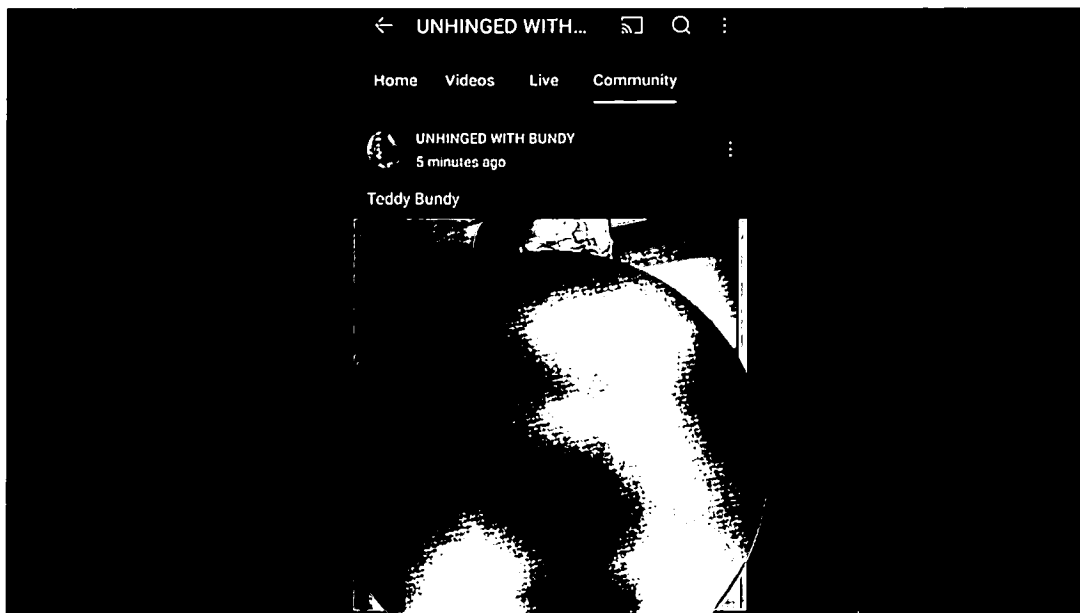
Exhibit E: Copyright Infringement – Unauthorized Use and Distribution

On June 23, 2024 The Defendant Danielle Robertson published Deepfake pornography she created using plaintiff's image to her website, (ICANTICANT.COM).



Exhibit F: Copyright Infringement – Unauthorized Use and Distribution

On June 23, 2024 The Defendant Danielle Robertson published Deepfake pornography she created using the plaintiff's image to her YouTube channel "Unhinged With Bundy."



Defamation and Privacy Violations

On May 28, 2024, YouTube removed the defendant's video, which contained unlawfully obtained copyrighted photos from the April 9, 2024, PPO hearing, citing violations of its Terms of Service.



YouTube Support Team <privacy-2adri4f1tmymq02@support.youtube.com>
to me

May 28, 2024, 10:26 PM ☆ 😊 ↶ ⋮

Hello,

We have removed the material in question for a privacy violation, pursuant to our Community Guidelines. It may take some time for video search results and thumbnail images to disappear from the site. Typically, this should not take more than a couple of days. Please be assured that the content has been removed. For more information regarding our Privacy Guidelines, please visit: https://youtube.com/privacy_guidelines.

Regards,

The YouTube Legal Support Team

On May 27, 2024 Contact Us Form wrote:

```
legalfirstname: Sybrena
legallastname: Kenan
country_req: US
email_validation_preferred_list: wmlcwthitcdgy@gmail.com
piusername: https://www.youtube.com/BOANIMONIMATV
optional_videos: https://www.youtube.com/watch?v=sRYVazc8oo
privacytype: privacyimage
privacylocation: privacylocwithinvid
privacy_multi_timestamp_2: 17:59
privacy_video_coded: no
privacyaddinfo: Dani Robertson post my photo after illegally obtaining a
recording of fraudulent PPO hearing. Please remove it as the judge
admonishes all parties it was private.
privacy_agreements: goodfaith
privacy_agreements: truecorrect
youtube_subject: Youtube Support
```

Evidence showing the defendant's video was removed for violating YouTube's Terms Of Service.

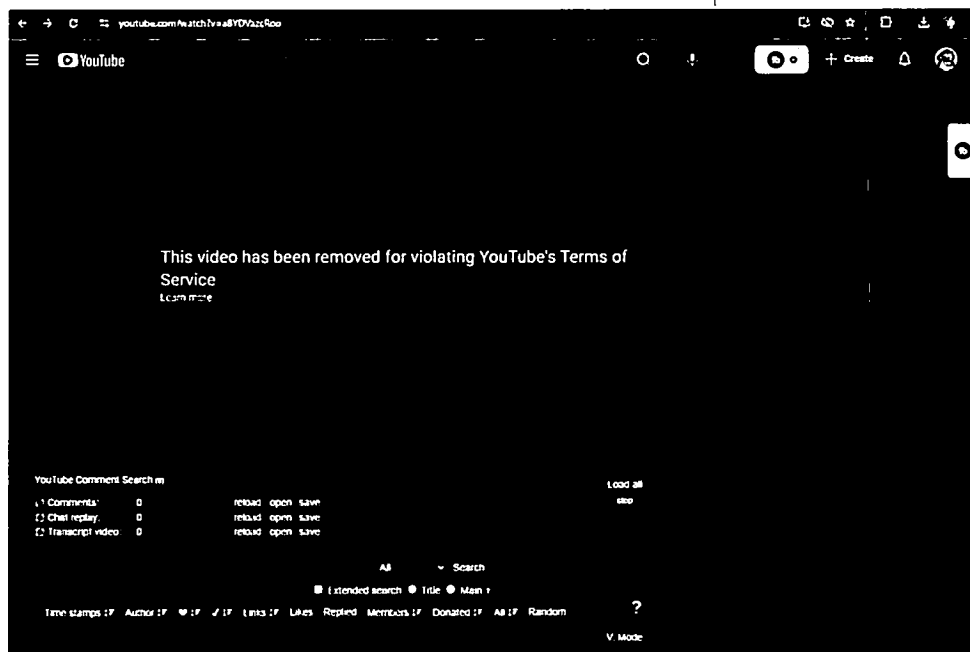
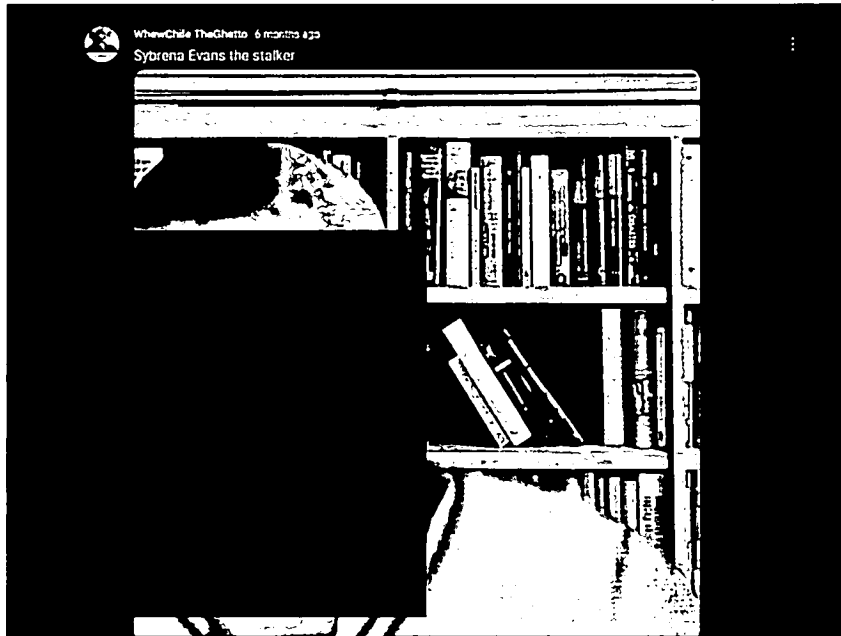
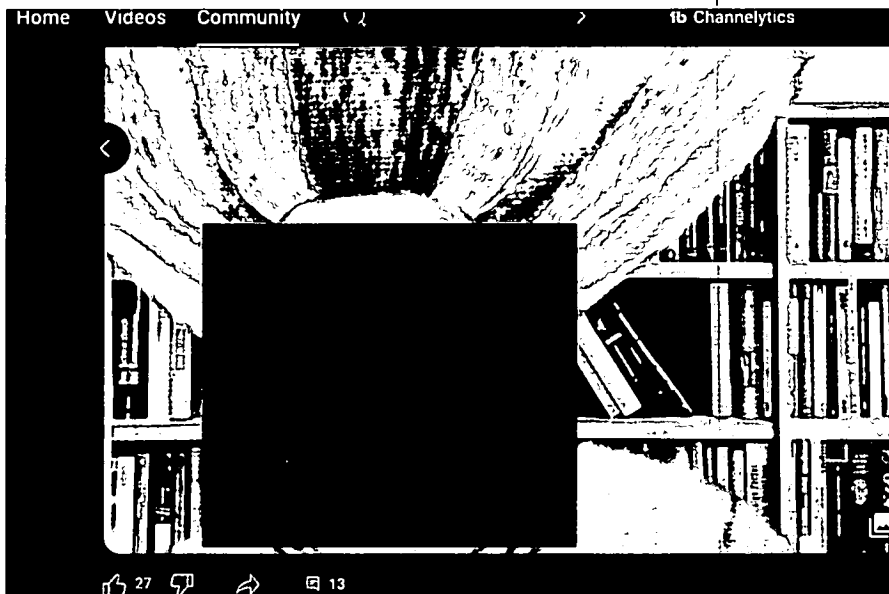


Exhibit G: Copyright Infringement – Unauthorized Use and Distribution

The defendant used the copyrighted material to humiliate the plaintiff and damage her reputation.



The defendant used the copyrighted material to humiliate the plaintiff and damage her reputation.



The defendant used the copyrighted material to humiliate the plaintiff and damage her reputation after posting this photo to her website (ICANTICANT.COM).

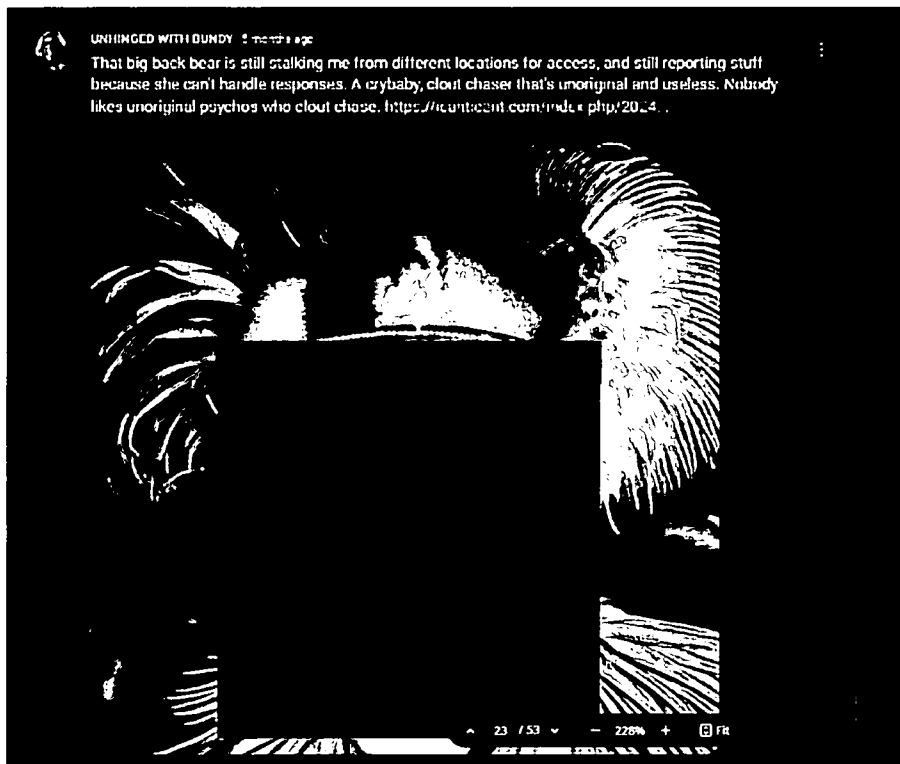


Exhibit H: Defamation and Privacy Violations

"Single Black Female" Series Beginning May 5, 2022, the defendant falsely portrayed the Plaintiff as a psychopathic serial killer, using the defamatory nickname "Teddy Bundy." This narrative continues to this day.

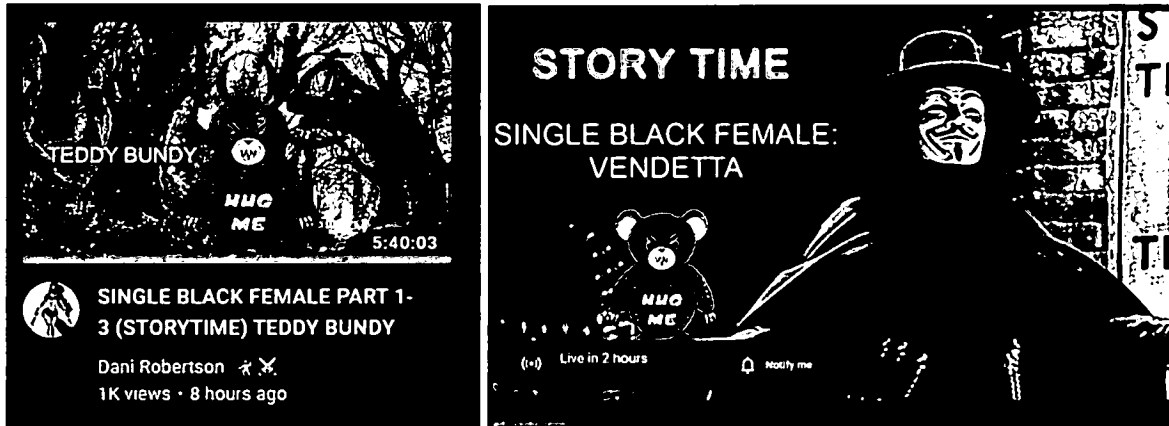


Exhibit I: Defamation and Privacy Violations

"Unsolved Michigan Cold Cases" On April 10, 2023, the defendant falsely accused the plaintiff of stalking neighbors, involvement in a homicide, and referred to her as "A Black Karen" linked to other Michigan crimes.



<https://www.youtube.com/watch?v=chJwHwahIZA>

Here is a screen of her community wall, with instructions to report you. Step by step.



WhewChile TheGhetto · 7 hours ago (edited)

1. Information about Sybrena (Teddy Bundy) needed to file the complaint
[https://uspio.repor\[REDACTED\]098/FTK2...](https://uspio.repor[REDACTED]098/FTK2...)
 2. Physician Assistants license number [REDACTED]
 2. File a medical complaint against the license for doxing and possible access to confidential records as a Physician Assistant <https://www.michigan.gov/lara/bureau...>
 3. File an anonymous tip for cyber harassment- <https://www.p3tips.com/tipform.aspx?l...>
 4. Video about this with instructions (will be posted soon)
- Show less



Exhibit K: Defamation and Privacy Violations

On August 21, 2022, defendant created the defamatory Twitter account "Public Awareness To Medical Malpractice" and falsely claimed that public figure Dr. Sybrena Kenan was found guilty of medical malpractice, damaging plaintiff's professional reputation.

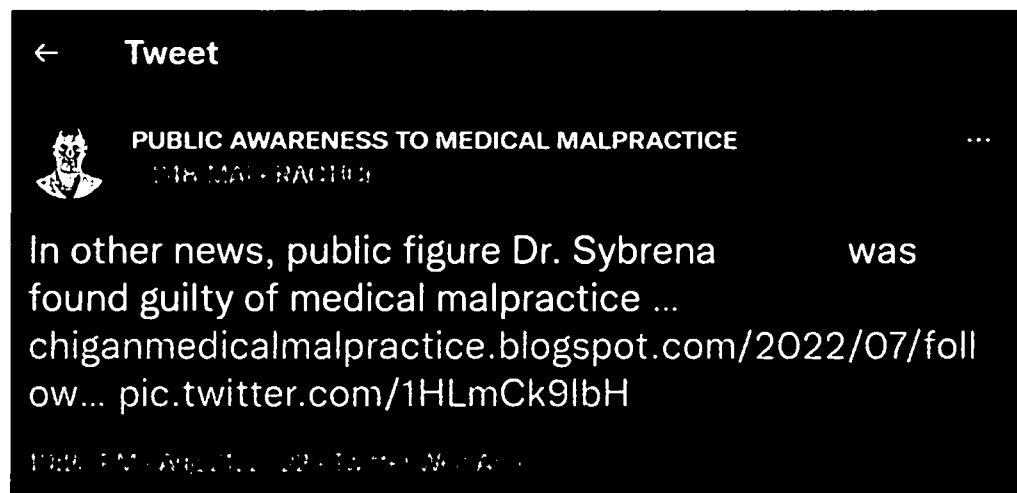
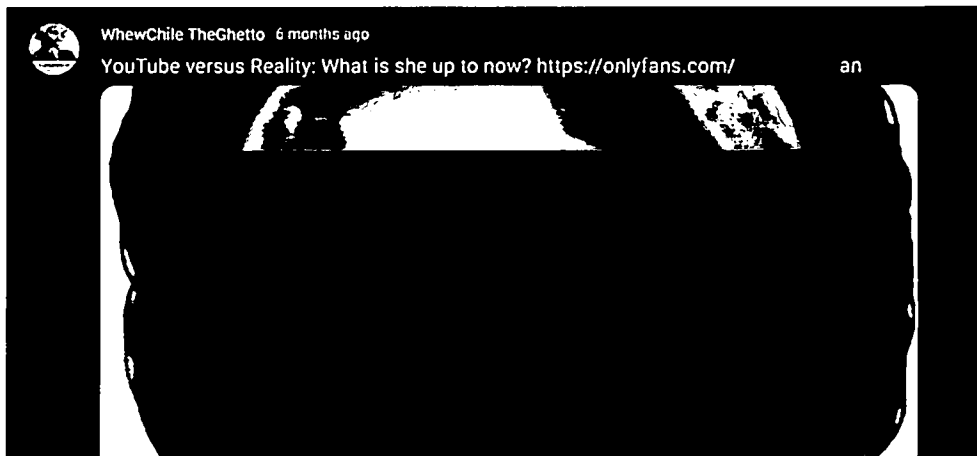


Exhibit L: Defamation and Privacy Violations

On April 8, 2023, defendant created and distributed explicit deepfake pornography impersonating plaintiff through a fabricated "OnlyFans" account with links to a Docdroid.net file. The image was made using police body camera footage obtained during a fraudulent "Wellness Check" on October 3, 2022.



The defendant created "OnlyFans" Impersonation page of plaintiff

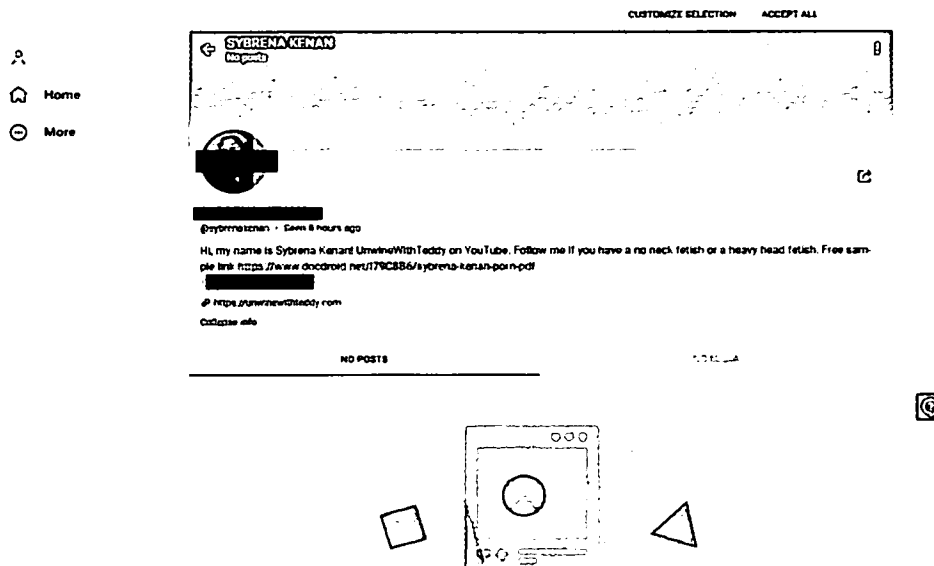


Exhibit M: Defamation and Privacy Violations

Defendant falsely claimed that plaintiff "gets drunk during her live streams," engages in inappropriate behavior, and urged others to file complaints with the Michigan Medical Board alleging substance abuse, alcohol consumption, and mental illness.

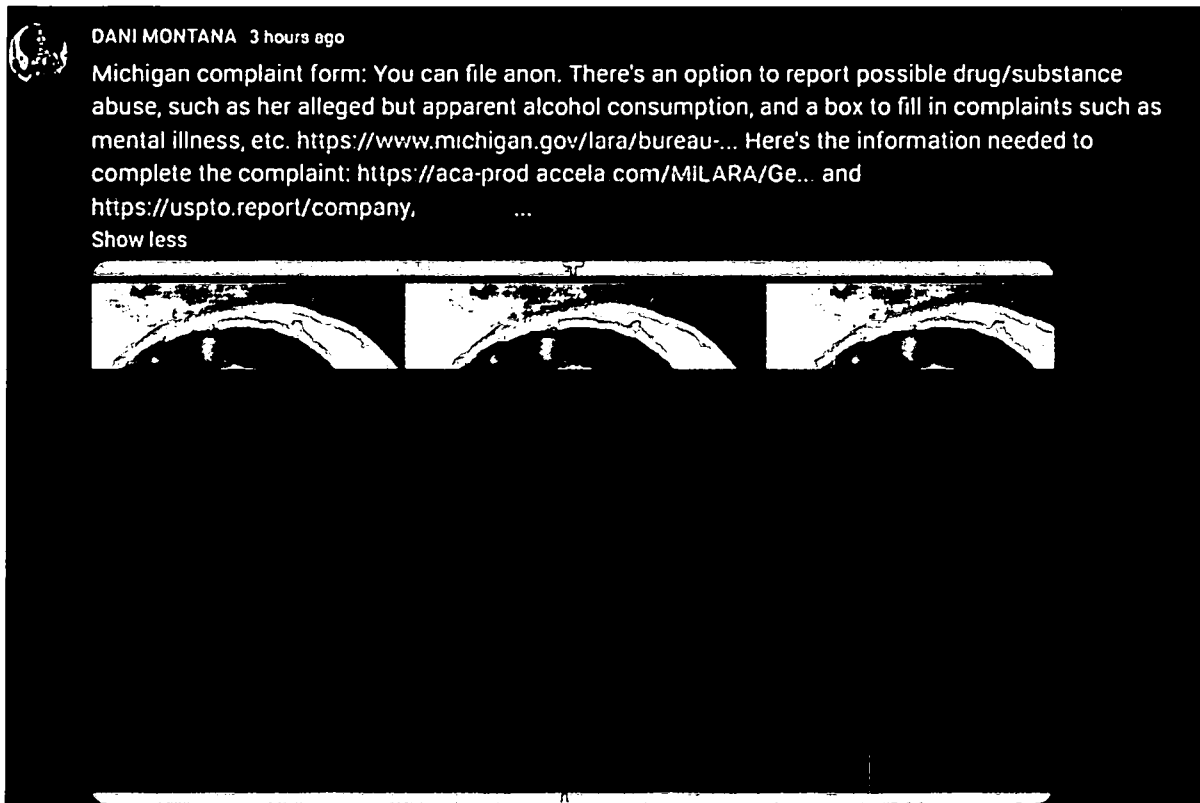


Exhibit N: False Reports and Fraudulent Claims

On October 3, 2022 (#22-28031), the defendant impersonated a relative of the plaintiff and initiated a fraudulent wellness check, falsely alleging mental health concerns.

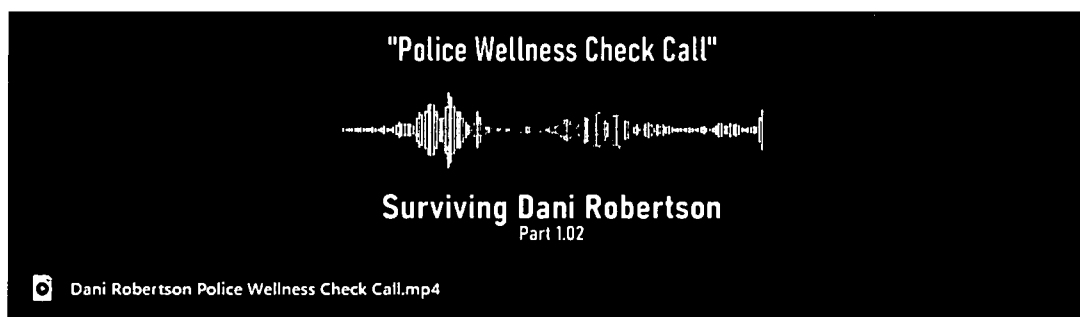


Exhibit O: False Reports and Fraudulent Claims

Responding officers recorded police body camera footage of the plaintiff at her residence, capturing her in a bathrobe, following a fraudulent wellness check initiated by the defendant on October 3, 2022 (#22-28031).



Exhibit P: False Reports and Fraudulent Claims

The defendant impersonates another relative of the plaintiff and initiates a second fraudulent wellness check, falsely alleging mental health concerns. June 13, 2023 (#23 -15558)



Exhibit Q: False Reports and Fraudulent Claims

On June 15, 2023 (#23-15718), the defendant falsely impersonated a neighbor to file a fraudulent report alleging animal cruelty and abuse against the plaintiff, leading to an unwarranted wellness check by police. These false claims caused emotional distress and unfairly labeled the plaintiff as abusive.

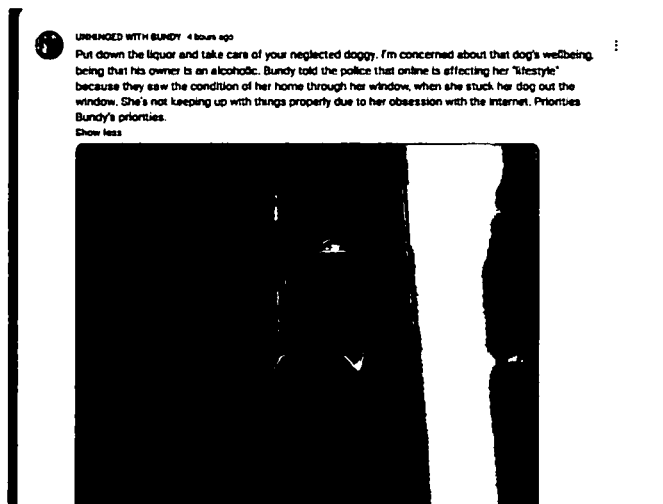
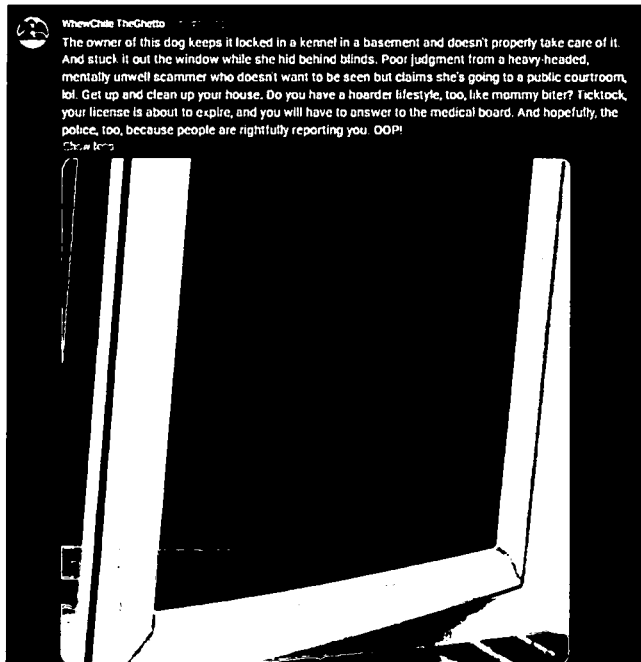


Exhibit R: False Reports and Fraudulent Claims

Despite repeated removals by YouTube for privacy violations, the defendant persistently re-uploaded the video footage and photos of the plaintiff in her bathrobe.

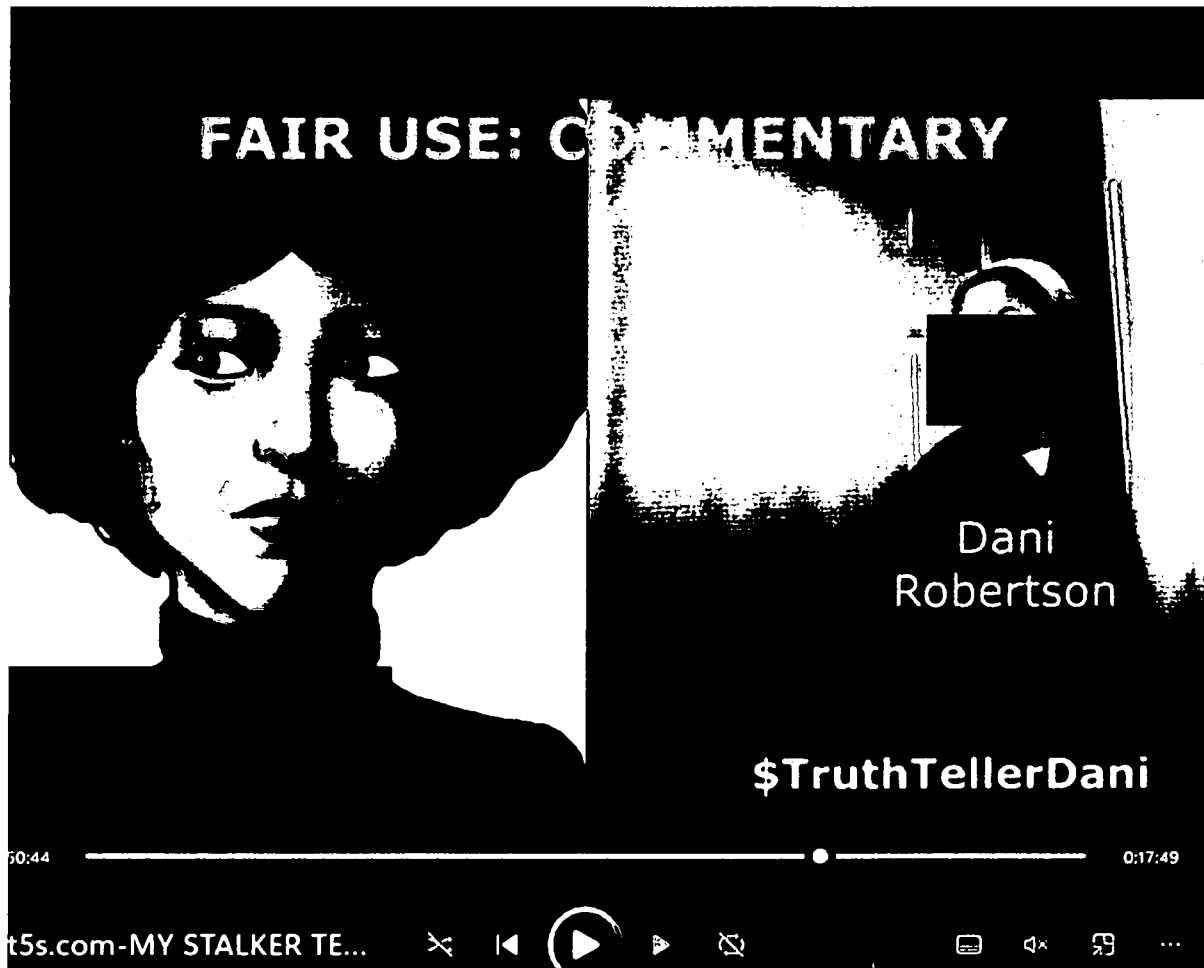


Exhibit S: False Reports and Fraudulent Claims

On or about September 12, 2023, the defendant submitted a complaint to the Michigan Medical Board, falsely alleging professional misconduct by the plaintiff without evidence.

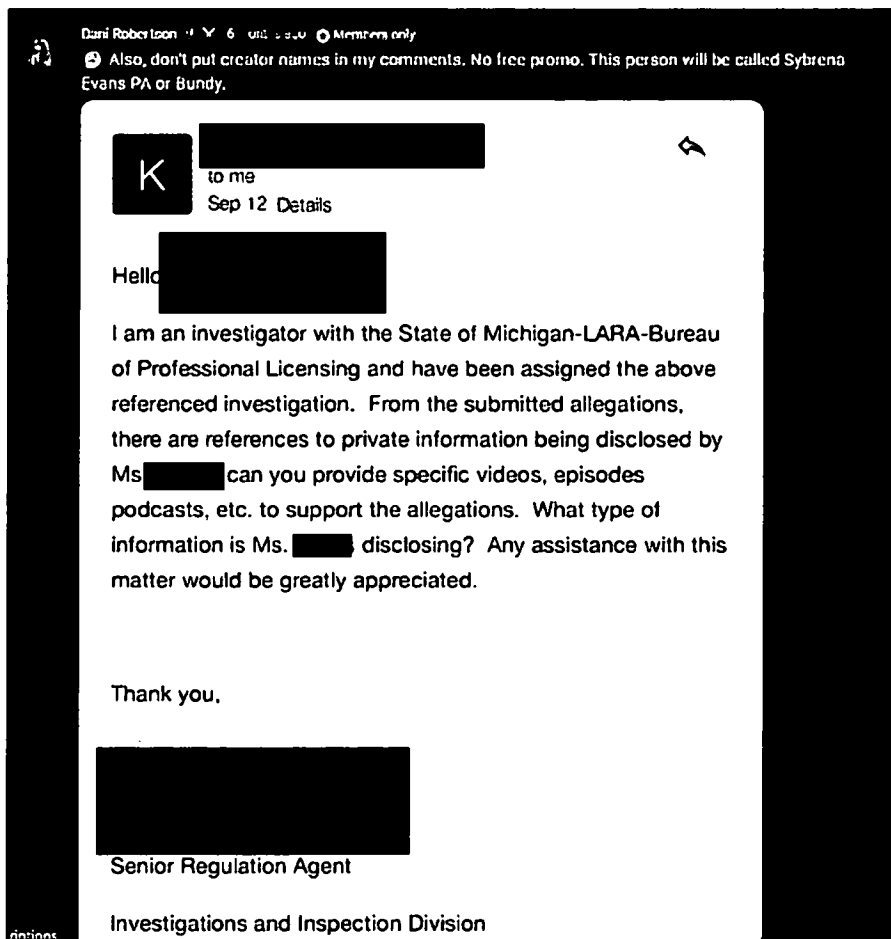
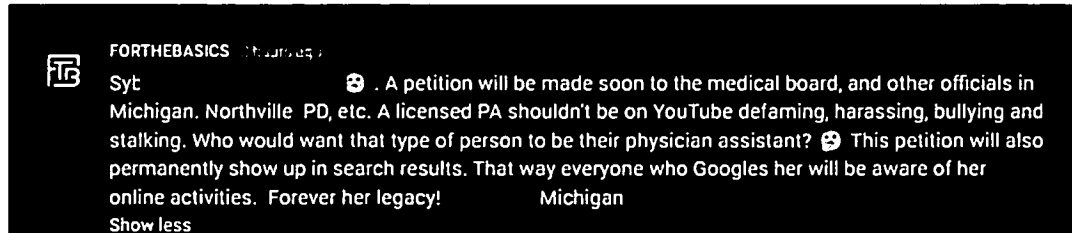
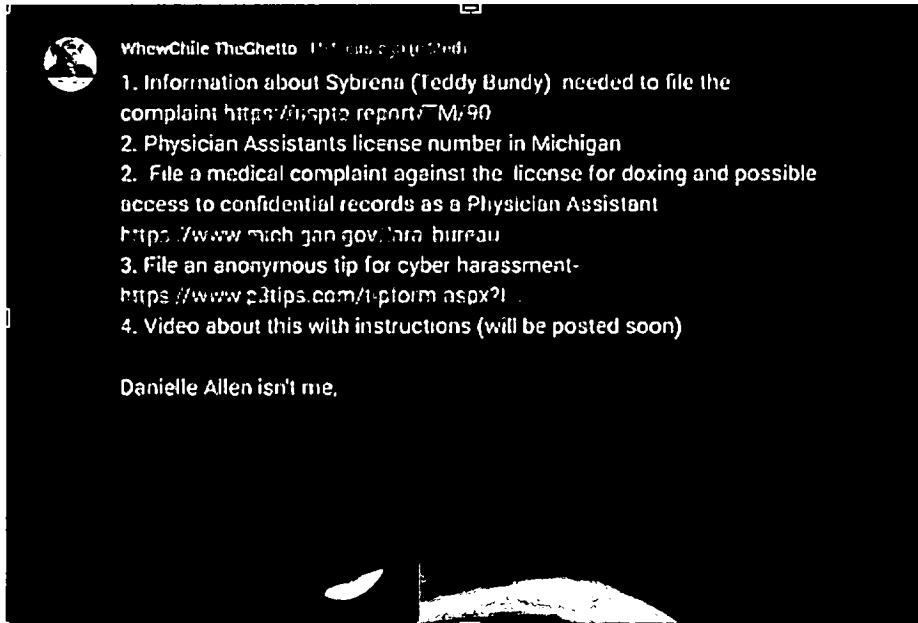


Exhibit T: False Reports and Fraudulent Claims

The Defendant Danielle Robertson posted video instructions on her website, encouraging mass reporting of the plaintiff's medical license.



WhewChile TheGhetto 11M views · 3 years ago

1. Information about Sybrena (Teddy Bundy) needed to file the complaint <https://m3pt2-report.com/>
2. Physician Assistants license number in Michigan
2. File a medical complaint against the license for doxing and possible access to confidential records as a Physician Assistant <https://www.michigan.gov/hra/bureau>
3. File an anonymous tip for cyber harassment- <https://www.p3tips.com/tipform.aspx?l>
4. Video about this with instructions (will be posted soon)

Danielle Allen isn't me.

Exhibit U: False Reports and Fraudulent Claims

On April 16, 2024, the Bureau of Professional Licensing informed the plaintiff that no violation of the Public Health Code could be substantiated, and the matter was closed.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON L. BROWN, DPA
DIRECTOR

April 16, 2024

[REDACTED] Evans, P.A.
[REDACTED]

Re: File # [REDACTED]

Dear [REDACTED]

[REDACTED] this matter has been
closed.

Sincerely,

[REDACTED]
Bureau of Professional Licensing
BPL-Complaints@michigan.gov

Exhibit V: False Reports and Fraudulent Claims

On April 22, 2024, following the Medical Licensing Board's decision on April 16, 2024, to close the case against plaintiff Sybrena Evans, the PPO Petitioner filed a new complaint with the Medical Licensing Board.



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

MARLON I. BROWN DPA
DIRECTOR

April 22, 2024



Licensee: [REDACTED]

Dear Complainant:

Thank you for contacting the Bureau of Professional Licensing. We are in receipt of the information you provided regarding the above-referenced licensee.

The information will be thoroughly reviewed to determine if there has been a violation of the Michigan Public Health Code. Unfortunately, all information related to this complaint must be kept confidential due to statutory requirements; therefore, we cannot disclose to you any information obtained during the review and investigation processes. Depending on the nature of the complaint, this process could take several months.

If an actionable violation of the Public Health Code is found, this matter will proceed through the enforcement process. If disciplinary sanctions are issued against the licensee, the disciplinary documents will be posted on our "Verify a License" web page at: <https://www.michigan.gov/BPL>

We appreciate your interest and patience as this matter is processed. If you have questions, please contact the Bureau's Complaint Intake Section at (517) 241-0205.

Sincerely,

Complaint Intake Section
Investigations & Inspections Division
Bureau of Professional Licensing
BPL-Complaints@michigan.gov

BUREAU OF PROFESSIONAL LICENSING
811 W OTTAWA • P.O. BOX 30670 • LANSING, MICHIGAN 48209

Exhibit W: False Reports and Fraudulent Claims

The Defendant, Danielle Robertson, was notified of this second complaint by the PPO Petitioner and subsequently posted about it on her YouTube platform "Unhinged With Bundy," revealing their coordinated efforts to harm plaintiff's professional reputation.



UNHINGED WITH BUNDY 7 days ago (edited)

This was sent to me. So, I'm sharing it. Again, I didn't file this, someone else did. Howe
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without clout c
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lcantlcant.com
own eyes what has been submitted or not submitted regarding her.
Show less

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VS

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STATE OF MICHIGAN
DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS
LANSING

GRETCHEN WHITMER
GOVERNOR

MARLON L. BROWN DPA
DIRECTOR

April 22, 2024



Licensor: Sybrona Evans
COM24-002387

Dear Complainant:



Exhibit X: False Reports and Fraudulent Claims

On June 11 and September 16, 2024, and after it was determined on April 16, 2024 there was no basis to Defendant Danielle Robertson's initial claim, the defendant continued to file additional false claims with the Michigan Medical Board in an attempt to have the plaintiff's medical license revoked.

June 11, 2014

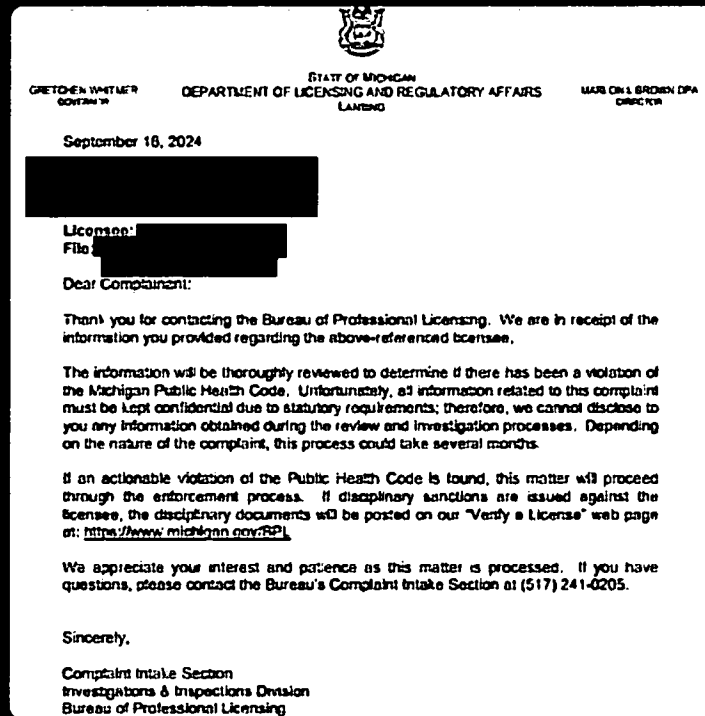


September 16, 2024



DANI MONTANA · 2 months ago

Money grabbing, clout chasers continue to get drunk and make 'fake' countdowns, not knowing what things mean or how to comprehend documents. Meanwhile, they're under investigation again by the Michigan Medical board. I'm sure their internal files are loaded with complaints because of their unethical conduct. Similar to bad cops who have a ton of internal complaints filed against them. A pattern of behavior has been established IMO, alcoholism is a contributing factor in her behavior. Show less



👍 117 🗨️ 16

Exhibit Y: Cyberbullying and Harassment

On or around July 17, August 1, and August 8, 2022, the Defendant Danielle Robertson filed 35 fraudulent copyright claims against the plaintiff's YouTube channels "UNWINEWITHTEDDY and RunTellThatToo," impersonating YouTuber NoseyHeauxLive, and falsely claiming ownership of the plaintiff's content.

Sun, Jul 17, 2022 at 10:19 PM



Hi UNWINEWITHTEDDY,

Due to multiple copyright strikes associated with the videos below, your YouTube account has now been disabled:

Video title: VINTAGE #NOSEYHEAUXLIVE | I KNOW A THING OR TWO ABOUT A SugarDADDY Oops! | #SHORTS | UNWINEWITHTEDDY

Video url: https://www.youtube.com/watch?v=DC7J7_ovG_s

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | I'M BEING MESSY LET ME SHOW YOU HOW TO POP IT! | #SHORTS | UNWINEWITHTEDDY

Video url: https://www.youtube.com/watch?v=POGmZR0pw_A

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | MY MOTHER WROTE ME A LETTER I'LL NEVER FORGET | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=71lfmfmgeCE>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | CHILD FREE & DONT HAVE TO BUY SCHOOL SUPPLIES | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=TcQOoxHgE80>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | "PULL CLOSE" "YOU KNOW I LIKE TO DRAG A BITGH" | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=o2a-SexNq20>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: NOSEY HEAUX LIVE featuring JAGUAR WRIGHT | Trailer | VINTAGE TEA COMING SOON! | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=sWOcOg78Fdk>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | NEW BOO Oops! | YOU NEVER KNOW WHAT I'M DOING | #SHORTS | UNWINEWITHTEDDY

Video url: https://www.youtube.com/watch?v=xsQ8kxK_n8U

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | DEAR NOSEY WHAT SHOULD I DO? | LEAVE HIM? | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=9PA1vnFaw00>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | NAPPY HAIR AND I DON'T CARE | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=AKr1yBN6Nhl>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | I STILL HAVE EDGES | NOT BALD HEADED LIKE YOU | #SHORTS | UNWINEWITHTEDDY

Video url: <https://www.youtube.com/watch?v=WRdv-b7SraM>

Contact info: tiffanygreen945@gmail.com

Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | I SERVE FACE...SERVING
FACE | YOU JUST MAD! | #SHORTS | UNWINEWITHTEDDY
Video url: https://www.youtube.com/watch?v=uFp2lv_dy_M
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | MY LIP COLOR IS MAC |
"FEELS SO GOOD" | #SHORTS | UNWINEWITHTEDDY
Video url: <https://www.youtube.com/watch?v=vFYYqDNvasU>
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | GETTING HOT PINK NAILS
and BEING EXTRA Oops! | #SHORTS | UNWINEWITHTEDDY
Video url: <https://www.youtube.com/watch?v=5Eq4azd7DT4>
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

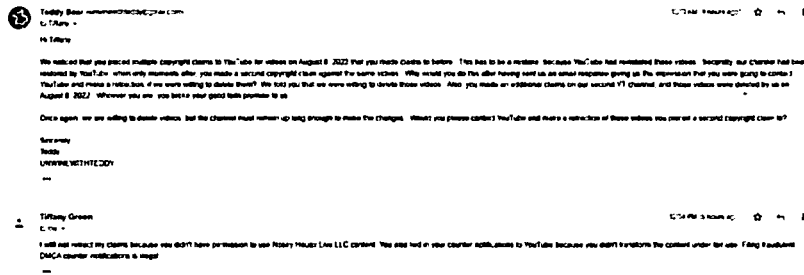
Video title: #YouTube Drama | VINTAGE NOSEY HEAUX LIVE |
SHARRELL'S WORLD | ALL ABOUT THE LIES Pt. 2
Video url: <https://www.youtube.com/watch?v=FrSVskNjRG0>
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | CHILDREN ARE TOO NEEDY
| JUST LEAVE ME ALONE | #SHORTS | UNWINEWITHTEDDY
Video url: <https://www.youtube.com/watch?v=aJuXvgSGVQE>
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

Video title: VINTAGE #NOSEYHEAUXLIVE | "PEOPLE DON'T ALWAYS
LIKE WHAT I SAY" BI@H BYE | #SHORTS | UNWINEWITHTEDDY
Video url: <https://www.youtube.com/watch?v=dbWXLaAwaBU>
Contact info: tiffanygreen945@gmail.com
Takedown issued by: TREAL TEA RADIO

August 8, 2022, the defendant impersonates NoseyHeauxLive as Tiffany Green during an email exchange between plaintiff and defendant:

Here: The plaintiff emails NoseyHeauxLive's Impersonator Tiffany Green requesting a retraction of copyright strikes. Tiffany Green aka Defendant Danielle Robertson responds: "I will not retract my claims because you didn't have permission to use Nosey Heaux Lve LLC content. You also lied in your counter notification to YouTube because you didn't transform the content under fair use. Filing fraudulent DMCA counter notifications is illegal."



August 8, 2022, the defendant creates an alias "Malcom Smith."

Here: The Defendant Danielle Robertson submits a fraudulent counter notification acting as Malcom Smith, and impersonating plaintiff's YouTube account, by using plaintiff's full legal name, and account information. Defendants action caused YouTube to reject plaintiff's counterclaim, and no longer be able to assist in the matter.

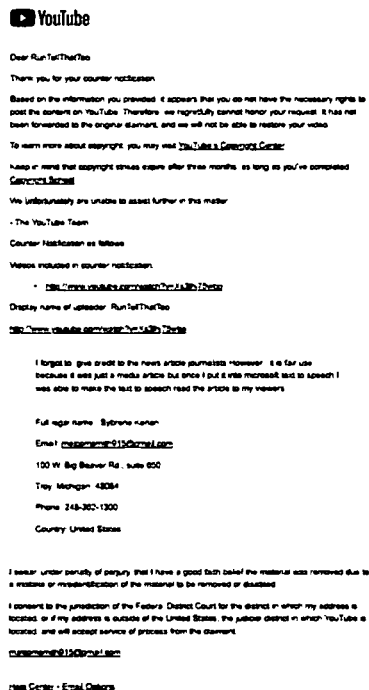
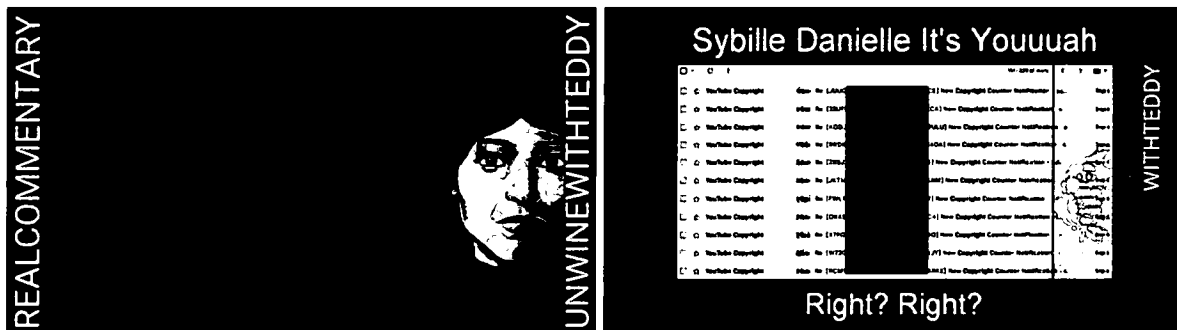
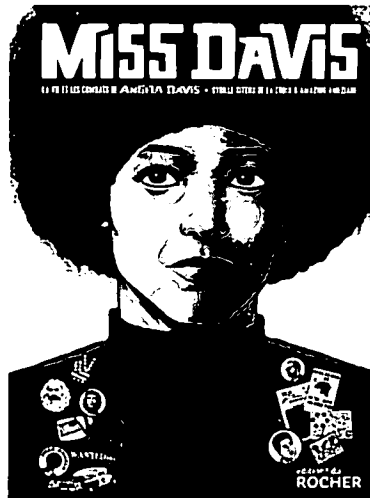


Exhibit Z: Cyberbullying and Harassment

Between September 6, 2023 and December 27, 2023, the defendant submitted more than 100 fraudulent copyright claims, falsely impersonating French author Sybille Titeux de la Croix. These claims targeted the plaintiff's channel avatar and videos featuring the image, leading to the termination of both UNWINEWITHTEDDY and RunTellThatToo YouTube channels. This disruption caused significant financial loss and emotional distress to the plaintiff.



**SYBILLE TITEUX DE
LA CROIX**



Just some of the many plaintiff's videos were removed by YouTube, after the defendant impersonated Sybille Titeux De La Croix and filed fraudulent copyright claims against the plaintiff's YouTube Channel "UNWINEWITHTEDDY."

Video title: YouTubeDrama | "TIC TOC TIC TOC" Let's Go! | RunTellThatToo

Video url: <https://www.youtube.com/watch?v=BdCvvxVyQQw>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | "TIC TOC TIC TOC" | RunTellThatToo

Video url: <https://www.youtube.com/watch?v=YzIQnvdMWaw>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | BREAKING! PRESIDENT JOE BIDEN TEST POSITIVE FOR COVID 19 | RunTellThatToo

Video url: <https://www.youtube.com/watch?v=hpkUdDo9mDE>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | "TIC TOC TIC TOC" Let's Get to 500 Subscribers! | RunTellThatToo

Video url: <https://www.youtube.com/watch?v=kM4cz3m2MLY>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | "DID YOU MAKE THE LIST TOO?" | RunTellThatToo

Video url: <https://www.youtube.com/watch?v=Dy3eMzRrwrq>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | IT'S HUMP DAY. LUNCH IS ON ME |
RunTellThatToo

Video url: https://www.youtube.com/watch?v=ZwbSql_me1Q

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | "HAVE LUNCH ON ME!" Music and Celebrity
News | RunTellThatToo

Video url: https://www.youtube.com/watch?v=_2KXAvKwrFI

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | "ONE LITTLE, TWO LITTLE THREE LITTLE..." |
RunTellThatToo

Video url: <https://www.youtube.com/watch?v=bdZvrZiailQ>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

Video title: YouTubeDrama | FRIDAY AFTERNOON "I'LL BUY LUNCH" |
RunTellThatToo

Video url: <https://www.youtube.com/watch?v=gR9BgobuPBk>

Content used: Miss Davis

Removal request issued by: Sybille Titeux de la Croix

Contact info: sybilledelacroix@outlook.com

This means that your video can no longer be viewed on YouTube.

You received a copyright strike

You now have **3 copyright strikes**. As a result, your channel is scheduled to be terminated in 7 days.

Exhibit A1: Cyberbullying and Harassment

On March 02, 2024, the defendant filed a fraudulent copyright claim against the plaintiff with the CCB to create a "paper trail."



**COPYRIGHT
CLAIMS BOARD**

Docket number: 24-CCB-0070
Filed date: 03/02/2024 06:22 PM EST

United States Copyright Claims Board

Danielle Robertson

Sybrena Evans Kenan

CLAIMANT

/s/

RESPONDENT

CLAIM

Payment status	\$40 (success)
Type	A claim for infringement A claim for misrepresentation under 17 U.S.C. 512(f)
Would you like to proceed as a "smaller claims" proceeding (including the \$5,000 monetary limit) instead of the standard CCB small claims proceeding?	Yes
Claimant	Name Danielle Robertson Address 8 The Green, STE A Dover, DE 19901 Email Danimontana2022@gmail.com Phone 860-864-0027 Authorized representative information Danielle Robertson

On March 24, 2024, the defendant posted the fraudulent complaint against the Plaintiff with the CCB to her website (ICANTICANT.COM) to create a "Paper Trail."

ICANTICANT

HomeSub Menu 1Sub Menu 2Sub Menu 3More

MICHIGAN! COPYRIGHT INFRINGEMENT -PERMANENT RECORD – ESTABLISHING A PUBLIC PAPER TRAIL – SHE DOESN'T HAVE A PUBLIC GOOD NAME! U.S. COPYRIGHT OFFICE. MORE PUBLIC RECORDS WILL BE ADDED TO HER NAME TO SHOW A PATTERN OF BEHAVIOR.


UNCATEGORIZED March 24, 2024 · 72 v.cws

00SHARE

Sybrene-Kenan-Evans-Infring...1 / 6100%+

3/2/24, 6:25 PM

Claim - eCCB

COPYRIGHT CLAIMS BOARD

Docket number: 24-CCB-0070
Filed date: 03/02/2024 06:22 PM EST

United States Copyright Claims Board

Danielle Robertson

Sybrene Evans Kenan

CLAIMANTRESPONDENT

CLAIM

Payment status


540 (success)

Type

A claim for infringement
A claim for misrepresentation under 17 U.S.C. 512(f)

Exhibits B1: Cyberbullying and Harassment

On October 18, 2024, YouTube reinstated 13 videos after determining the Defendant's copyright claims were invalid.



YouTube Copyright <youtube-disputes-0q0lx1t71md5f07@google.com>
to me ▾

Fri, Oct 18, 5:13 AM ☆ ☺

Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

https://youtube.com/watch?v=5wt_OLLjk_eM


As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Below is a record of the invalid takedown request we received for your video(s). Note that the complainant's physical address and phone number have been redacted.

[BEGIN COPY OF TAKEDOWN REQUEST]



Copyright takedown request received for your YouTube video inbox x



YouTube Copyright <youtube-disputes-0bv2u2wmc0n0v07@google.com>
to me ▾

Fri, Oct 18, 5:18 AM ☆ ☺ ↶

Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

<https://youtube.com/watch?v=PdCG7o0fBQ>

https://youtube.com/watch?v=x_oP1QXDCQM

As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Below is a record of the invalid takedown request we received for your video(s). Note that the complainant's physical address and phone number have been redacted.

[BEGIN COPY OF TAKEDOWN REQUEST]



Copyright takedown request received for your YouTube video Inbox x

YouTube Copyright <youtube-disputes-3g7zubxxwd5yf07@google.com>
to me ▾

Fri, Oct 18, 5:26 AM



Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

<https://youtube.com/watch?v=8NEjty8QzAw>

<https://youtube.com/watch?v=1vIAeQVuz8M>

As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Below is a record of the invalid takedown request we received for your video(s). Note that the complainant's physical address and phone number have been redacted.

[BEGIN COPY OF TAKEDOWN REQUEST]

Copyright takedown request received for your YouTube video Inbox x

YouTube Copyright <youtube-disputes-2xee445dnwid07@google.com>
to me ▾

Fri, Oct 18, 5:23 AM



Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

<https://youtube.com/watch?v=HIQYc-1h8jq>

<https://youtube.com/watch?v=x2X-dsri3NQ>

As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Below is a record of the invalid takedown request we received for your video(s). Note that the complainant's physical address and phone number have been redacted.

[BEGIN COPY OF TAKEDOWN REQUEST]

Copyright takedown request received for your YouTube video Inbox x

YouTube Copyright <youtube-disputes-1ba8trmhy7gqmz07@google.com>
to me ▾

Sat, Oct 19, 9:38 AM



Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

<https://www.youtube.com/watch?v=SB5Ju9Kuiw>

<https://www.youtube.com/watch?v=Tv7laU7q9w>

<https://www.youtube.com/watch?v=Wd4MFq56HBM>

<https://www.youtube.com/watch?v=caB9cz7bJRC>

As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Copyright takedown request received for your YouTube video [inbox](#)



YouTube Copyright <youtube-disputes-190a2ihkac6c07@google.com>
to me

Sat, Oct 19, 9:55AM



Hello,

We received a takedown request for your video(s) listed below that we've determined is invalid:

<https://www.youtube.com/watch?v=oY1ISSpCp8>

<https://www.youtube.com/watch?v=n7Xe-0PN2U>

As a result, we've reinstated your video(s) (unless they were previously deleted) and the associated copyright strike was resolved.

Exhibits C1: Cyberbullying and Harassment

Following the defendant's failure to respond to YouTube's request for precise identification of the allegedly copyrighted work, her account was terminated.

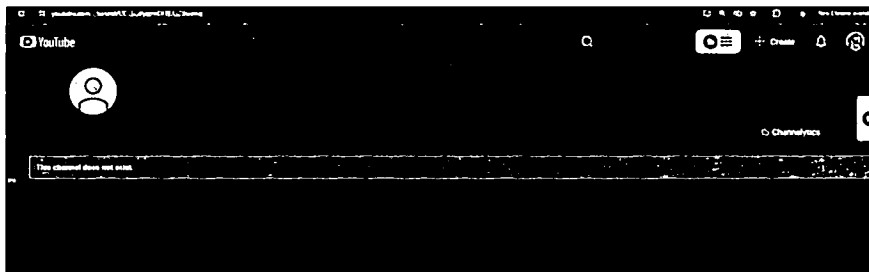
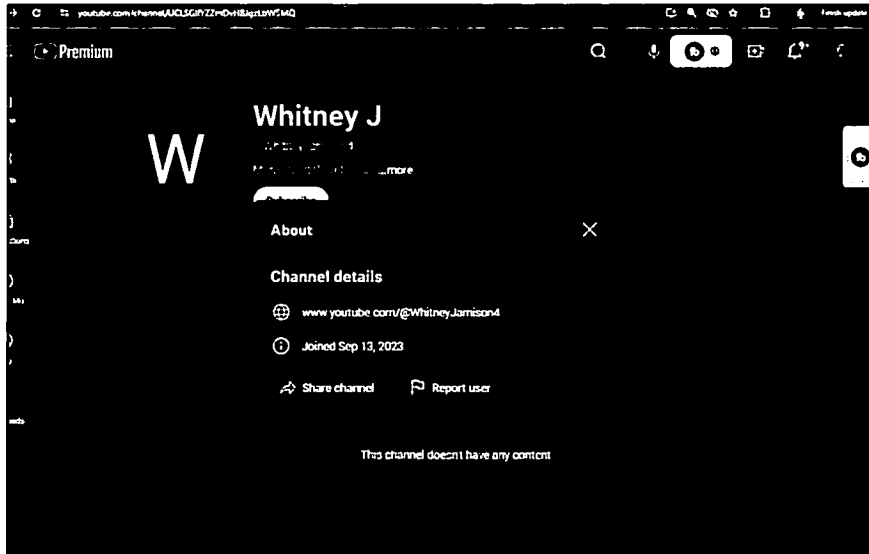


Exhibit D1: Cyberbullying and Harassment

Following the termination, the defendant retaliated by "porn bombing" the plaintiff's YouTube channel, RunTellThatToo.

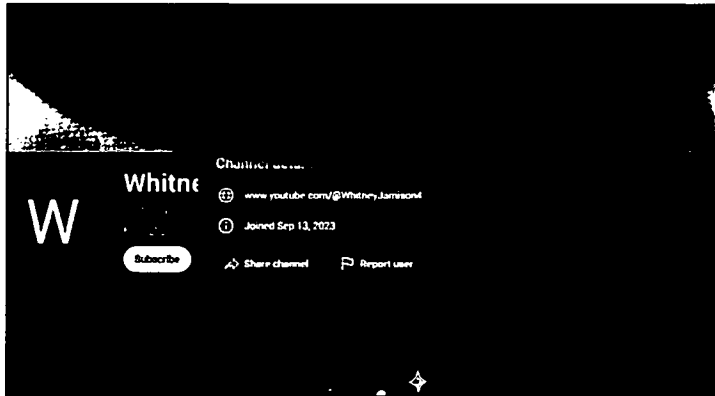
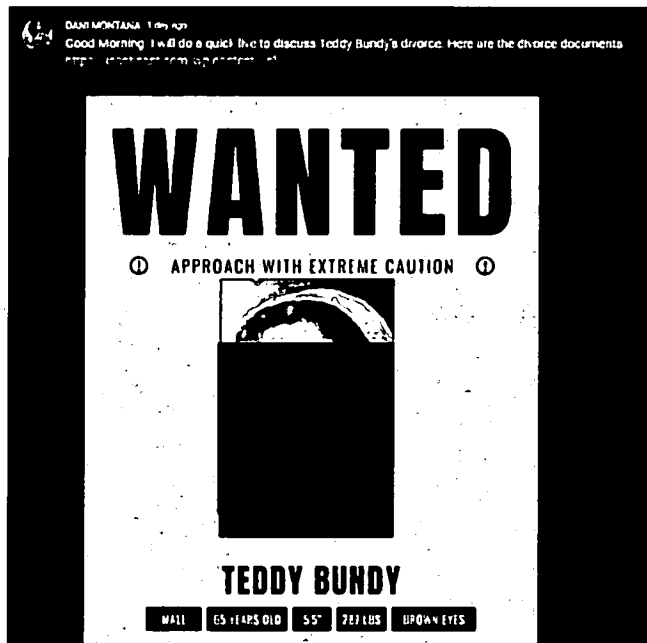


Exhibit E1: Cyberbullying and Harassment

On February 16, 2023, the defendant published a YouTube video titled "Breaking News: Bundy's Divorce and Skate Rink Lawsuit" to cyberbully and harass the plaintiff. The plaintiff's divorce documents were also published to (ICANTICANT.COM) This video violated the plaintiff's privacy and incited the defendant's followers to post defamatory content, resulting in a surge of online harassment.



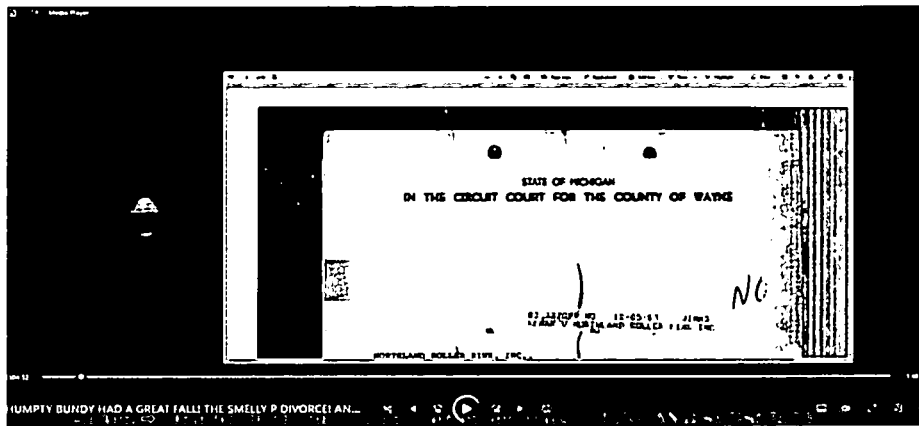


Exhibit F1: Cyberbullying and Harassment

The defendant used social media platforms, including impersonation accounts on Twitter, to publish false allegations against the plaintiff. These posts portrayed the plaintiff as mentally unstable, using horror movie imagery to depict her as a dangerous stalker or killer, creating the false impression that she poses a threat to others. These actions further incited harassment and targeted attacks against the plaintiff.

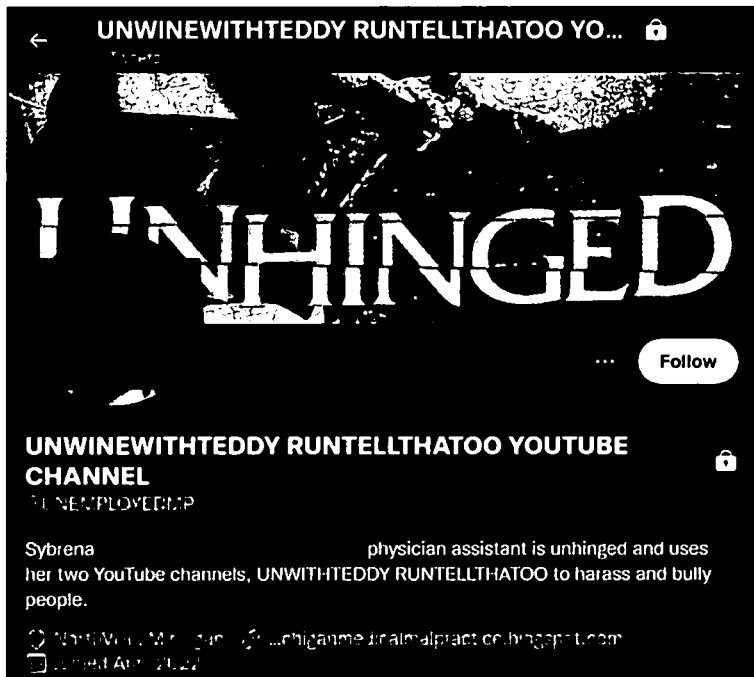


Exhibit G1: Cyberbullying and Harassment

In February 2023, the defendant publicly declared her intent to destroy the plaintiff's professional and personal reputation through intimidation, online cyberbullying, threats, and harassment.

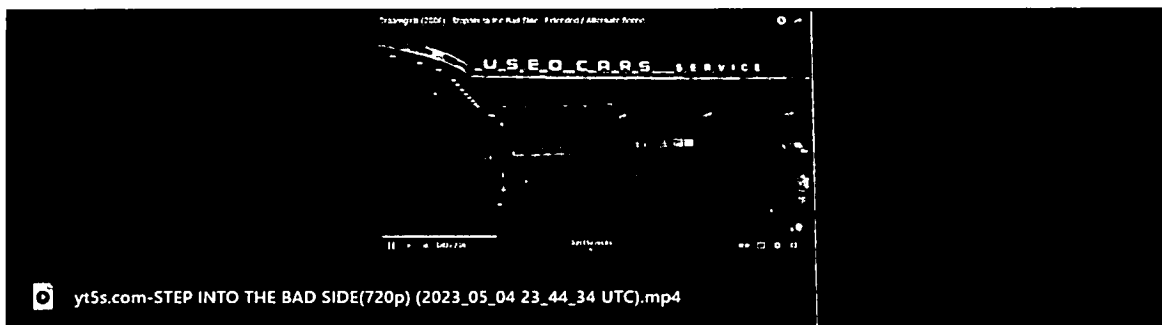
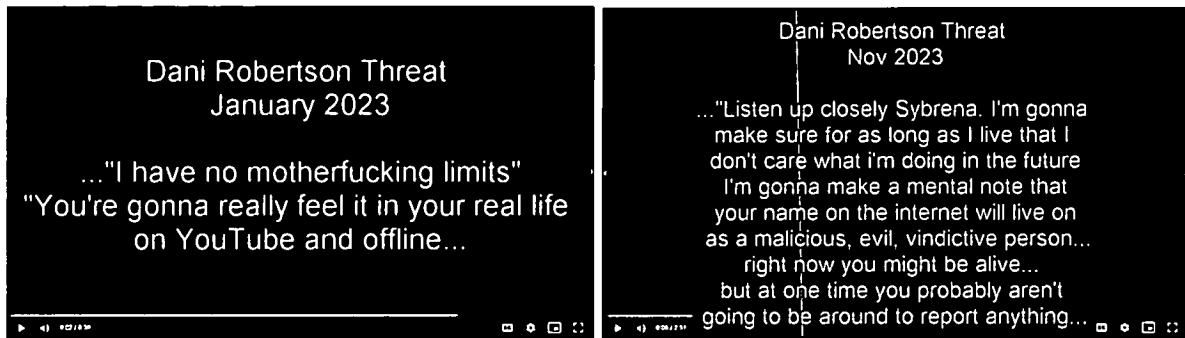
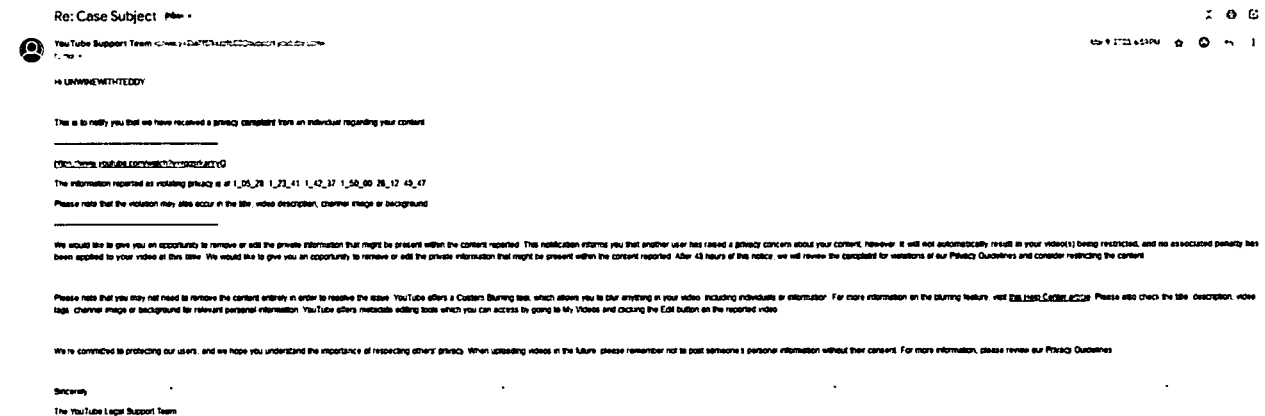
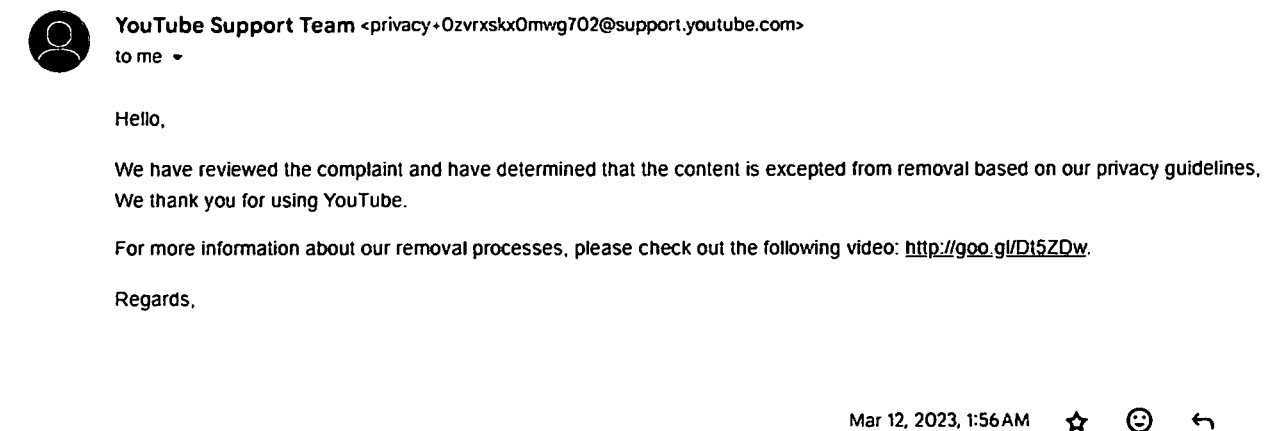


Exhibit H1: Impersonation of Others to Commit Fraud

On or around March 9, 2023, the defendant, impersonating Danielle Elizabeth Allen, filed nine fraudulent privacy violation claims against the plaintiff on YouTube, falsely alleging privacy law violations and attempting to create a deceptive paper trail.

**Exhibit I1: Impersonation of Others to Commit Fraud**

On March 12, 2023, YouTube rejected the defendant's privacy complaints against the plaintiff concerning photos.



which can be found at http://www.youtube.com/t/privacy_guidelines. The content does not violate our policies and will remain on the site.

Exhibit J1: Impersonation of Others to Commit Fraud

On March 12, 2023, YouTube denied Defendant Danielle Robertson's privacy complaints, confirming the content did not violate its privacy policies and would remain on the platform.

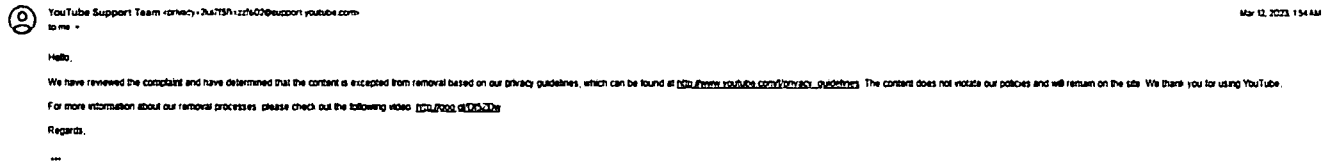


Exhibit K1: Impersonation of Others to Commit Fraud

On or around March 13, 2023, The Defendant, Danielle Robertson, later admitted to filing a false privacy complaint impersonating Danielle Elizabeth Allen. In her submissions to YouTube. She acknowledged knowingly falsifying legal documents.



Exhibit L1: Impersonation of Others to Commit Fraud

The defendant's fraudulent privacy claims to YouTube, impersonating Danielle Elizabeth Allen, contradict her own statements in a March 4, 2023, video titled "HEAR HER TV, MOMMY BITER MESSAGED ME! I GUESS JAGUAR WRIGHT CONTENT DRIED UP. THE BIRD BRAIN," posted on her channel For The Basics.

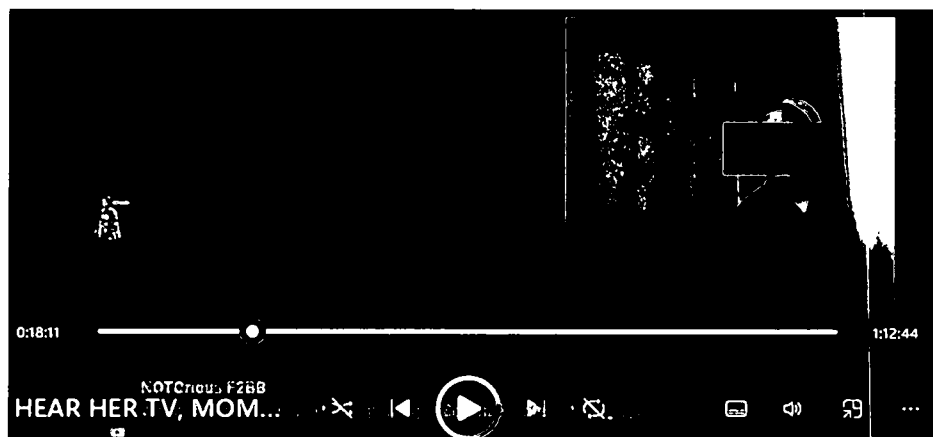


Exhibit M1: Conspiracy to Commit Fraud and Cause Emotional Distress

On April 2, 2024, Defendant Danielle Robertson announced an upcoming PPO hearing involving the plaintiff, posting about it on her website (ICANTICANT.COM). In the post, she labeled the plaintiff unethical, accused them of stalking 40 people, compared them to Ted Bundy, and referenced their professional title. Her knowledge of the hearing, 7 days prior, suggests coordination with the PPO petitioner.

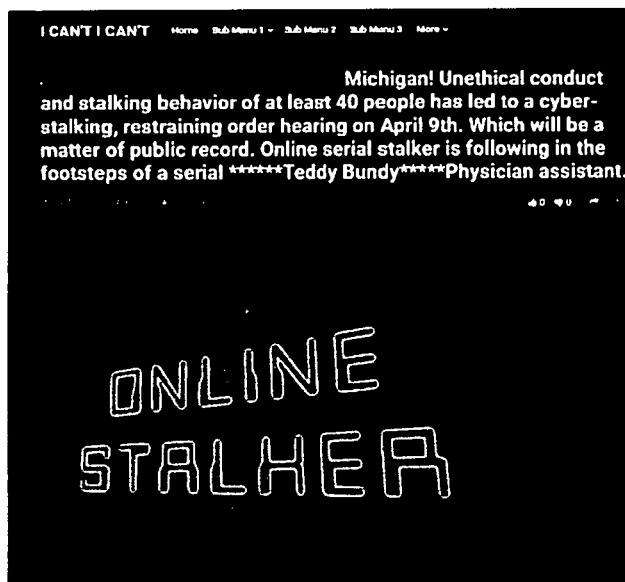


Exhibit N1: Conspiracy to Commit Fraud and Cause Emotional Distress

On April 9, 2024, the defendant collaborated with the PPO petitioner, acting as her proxy, to file a false PPO request to the court. The petition's language and accusations closely align with the defendant's rhetoric, strongly indicating that Danielle Robertson either authored or heavily influenced its content.

STATE OF MICHIGAN 3RD JUDICIAL CIRCUIT WAYNE COUNTY	PETITION FOR PERSONAL PROTECTION ORDER (NONDOMESTIC)	CASE NO. and JUDGE
---	--	--------------------

Court address: Coleman A. Young Municipal Center, 2 Woodward Avenue, Detroit, MI 48226
 Court telephone no.: (313) 224-6261

(A) Petitioner's name <div style="background-color: black; width: 100%; height: 40px;"></div>	Age 50	v	Respondent's name, address, and telephone no. <div style="background-color: black; width: 100%; height: 40px;"></div>	Age 65
--	-----------	---	--	-----------

1. The petitioner and respondent have never been married, resided in the same household together, had a child in common, or had a dating relationship with one another.

(B) 2. ☐ The respondent is required to carry a firearm in the course of his/her employment. ☒ Unknown.

(C) 3. a. There ☐ are ☒ are not other pending actions in this or any other court regarding the parties.

Case number	Name of court, county, and state or province	Name of judge

b. There ☐ are ☒ are not orders/judgments entered by this or any other court regarding the parties.

Case number	Name of court, county, and state or province	Name of judge

(D) 4. I need a personal protection order because: Explain what has happened (attach separate sheets).
 Please see attached "Statement of Facts"

(E) 5. I make this petition under the authority of MCL 600.2950a(1) and ask the court to grant a personal protection order prohibiting the respondent from

☒ a. stalking me as defined by MCL 750.411h and MCL 750.411i, which includes but is not limited to

- ☒ following me or appearing within my sight.
- ☒ appearing at my workplace or residence.
- ☒ approaching or confronting me in a public place or on private property.
- ☒ entering onto or remaining on property owned, leased, or occupied by me.
- ☒ sending mail or other communications to me.
- ☒ contacting me by telephone.
- ☒ placing an object on or delivering an object to property owned, leased, or occupied by me.

☒ b. threatening to kill or physically injure me.

☒ c. purchasing or possessing a firearm.

☒ d. posting a message through the use of any medium of communication, including the Internet or a computer or any electronic medium, pursuant to MCL 750.411s.

☒ e. other: See "Other Matters" in Attachment

Approved, SCAO: _____
 Form CC 377, Rev. 3/23

Distribute form to:
 Court

Exhibit O1: Conspiracy to Commit Fraud and Cause Emotional Distress

On or around April 27, 2024, the Defendant fabricated a second false PPO and published it on her website, ICANTICANT.COM, presenting it as legitimate to deceive her audience and perpetuate a false narrative. This fraudulent PPO was used to further damage the plaintiff's reputation and create a false basis for defamatory actions.

UNETHICAL MICHIGAN.
WAS SENT THREE CEASE AND DESIST, COPYRIGHT
INFRINGEMENT/MISREPRESENTATION CLAIM AND A PPO WAS
FILED! PAPER TRAIL.

0 0

<p>(A) Petitioner's name: <u>Danielle Robertson</u> Age: <u>34</u></p> <p>Address and telephone no. where court can reach petitioner: [REDACTED]</p>	<p>Respondent's name, address, and telephone no. Age: <u>65</u></p> <p><u>Sybrena Evans</u> [REDACTED]</p>
---	--

1. The petitioner and respondent have never been married, resided in the same household together, had a child in common, or had a dating relationship with one another.

(B) 2. The respondent is required to carry a firearm in the course of his/her employment. ☐ Yes ☒ Unknown.

(C) 3. a. There ☐ are ☒ are not other pending actions in this or any other court regarding the parties.

Case number	Name of court, county, and state or province	Name of judge

b. There ☐ are ☒ are not orders/judgments entered by this or any other court regarding the parties.

Case number	Name of court, county, and state or province	Name of judge

(D) 4. I need a personal protection order because: Explain what has happened (attach separate sheets).
Please see attached "Statement of Facts"

(E) 5. I make this petition under the authority of MCL 600.2950a(1) and ask the court to grant a personal protection order prohibiting the respondent from

☒ a. stalking me as defined by MCL 750.411h and MCL 750.411i, which includes but is not limited to

- ☒ following me or appearing within my sight.
- ☐ appearing at my workplace or residence.
- ☐ approaching or confronting me in a public place or on private property.
- ☐ entering onto or remaining on property owned, leased, or occupied by me.
- ☒ sending mail or other communications to me.
- ☒ contacting me by telephone.
- ☐ placing an object on or delivering an object to property owned, leased, or occupied by me.

☐ b. threatening to kill or physically injure me.

☐ c. purchasing or possessing a firearm.

Exhibit P1: Conspiracy to Commit Fraud and Cause Emotional Distress

On October 14, 2023, Defendant Danielle Robertson created a "Change.org" petition falsely accusing Plaintiff Sybrena Evans of unethical behavior, collaborating with a violent criminal, and supporting physical harm, damaging her professional reputation as a Physician Assistant.

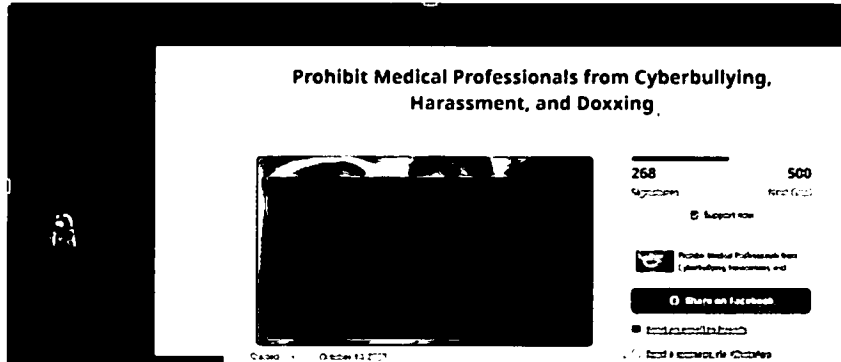


Exhibit Q1: Conspiracy to Commit Fraud and Cause Emotional Distress In her November 4, 2023, YouTube video titled "WHO IS DANIELLE ELIZABETH ALLEN! SYBRENA'S PETITION! TEDDY BUNDY'S OBSESSION! BLACK TEA SECTOR DRAMA," the defendant, Danielle Robertson, falsely portrays the plaintiff as a dangerous stalker, defaming her professional character and promoting a defamatory Change.org petition.



Exhibit R1: Conspiracy to Commit Fraud and Cause Emotional Distress

On February 10, 2023, Defendant Danielle Robertson posted the plaintiff's late brother's obituary on her YouTube channel "For The Basics" and later in another video, "Step Into The Bad Side." The defendant falsely accused the plaintiff of causing her brother's death, even suggesting murder, causing severe emotional distress.

